

From: tdshurling@aol.com
To: [Clark, Ethel D.](#); pahoward@sccourts.org
Cc: MJameson@scag.gov
Subject: Re: 2022-000710
Date: Monday, October 17, 2022 3:21:43 PM

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Ms. Clarke,

Now that I am at my office I think I see what happened. I am addressing this to you because I thought you might need to know what I found. I have, of course, sent this to Ms. Patricia Howard and Meghan Jameson as well. Last Tuesday I came to my office, but had to leave after lunch because I was still sick. Before I left I checked my email and did not see anything concerning this case in my in box. I was home sick the remainder of the week, but checked my email daily. This morning was the first time I saw your email with the Court's Order giving me until last Friday, October the 14th to file the certioari petition and appendix in this matter. As I stated in my early morning email to you, I assumed I had just missed the email. Now that I am at my office I think I see what happened.

The email I opened this morning had a copy of the Court's Order granting me until last Friday attached. When I arrived at my office this morning, I looked for the same email. While your email was there, the attachment would not open and had a caption saying "*virus scan failed.*" I can only assume the software on my iPhone detected what was believed to be a virus and then ran another scan later and it passed the scan. It does not make much sense to me, but I am not much of a

technical wizzard either. What I do know is that if I had not been so ill, it would have occurred to me to check the case management system. I apologize that I did not think to do that, but I was so miserably sick it just did not occur to me to do so. To be perfectly frank, if I had seen the Court's Order before sooner, my only option would have been to contact the Court and plead for the Court's assistance because I was still too sick to complete the Certiorari Petition and the Appendix by October 14th.

With the addition of another medication, I am some better today. I have worked a little from home and rested as much as possible for days. I still have a terrible sinus infection, an ear infection and a sore throat. The cough and headaches have improved enough thta I was able to come in to my office today. That being said, I am hopeful that I will be able to finish the petition tomorrow and edit it to include proper references to the Appendix Wednesday. I apologize for the delay in this matter, but I have no choice. I have been sick for two months. I have taken two courses of a very strong antibiotic because it was thought I must have developed a secondary infection from the congestion caused by my allergies. Apparently that was not the case becuase the antibiotics did not help at all. What I do believe is that flying to Mississippi to see four clients, that had been transferred to a private prison there, exacerbated my sinus issues and once I got home, the barometric pressure from the tail end of hurricane Ian caused my sinuses and ears to get inflamed and congested again. I have had bad fall allergies all my adult life and this fall they have been worse than I have experienced in years.

I promise I will do everything in my power to get this done, served and filed by Wednesday. For my client's sake, I hope the Court will allow me to file this Petition and Appendix when it is completed. I can't promise I can have it done by Wednesday because, as I write this, I am getting worse again and I am going to have to go home shortly. I will do my best. Thank you for your time.

Tara

Tara Dawn Shurling
Attorney at Law
S.C. Bar No. 5099

-----Original Message-----

From: tdshurling <tdshurling@aol.com>
To: Clark, Ethel D. <edclark@sccourts.org>
Cc: Megan Jameson <MJJameson@scag.gov>
Sent: Mon, Oct 17, 2022 8:01 am
Subject: Re: 2022-000710

Good morning. I have been home sick since my filing last week regarding this case. I apologize for not seeing this order sooner, but I can understand how I missed it because I was very ill. Thankfully, I was able to rest all weekend and an additional medication has helped me feel much better this morning. I was able to complete this appendix last week with the help of my paralegal and thought it was complete. Unfortunately I now see that some documents that should have been included in the Appendix were left out. My paralegal and I have just finished adding those it is being printed today. My petition will be finished today although I expect it will be tomorrow before I can add page references to the petition. I apologize for this delay.. Until this morning I have just been too sick. I will get this petition and appendix submitted tomorrow and will most sincerely appreciate the Court accepting it for filing at that time..

Tara
Tara Dawn Shurling
Attorney at Law

Sent from my iPhone

On Oct 11, 2022, at 4:13 PM, Clark, Ethel D. <edclark@sccourts.org> wrote:

For your records.

Thank you,

Ethel

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