

RECEIVED

Nov 16 2022

S.C. SUPREME COURT

**STATE OF SOUTH CAROLINA
In the Supreme Court**

**APPEAL FROM RICHLAND COUNTY
Court of Common Pleas**

George M. McFadden, Jr., Circuit Court Judge

**Appellate Case No. 2022-000710
Lower Court Docket No. 2019-CP-40-0775**

GEORDI JERRELL HEYWARD, #374238,

PETITIONER,

V.

State of South Carolina,

RESPONDENT.

STATUS REPORT

On October 19, 2022, an Order was issued by this Honorable Court dismissing the above captioned PCR appeal. Counsel for Petitioner had been sick since the end of September and had been through two rounds of antibiotics for sinus and ear infections. As of October 7, 2022 she was still ill. Counsel took a COVID Rapid Test and it was negative. On October 19, 2022 Counsel's Internist, Dr. Jaiprakash N. Patel, M.D., Prisma Health Internal Medicine, ordered a PCR COVID test for Counsel for Petitioner. The following day, Counsel was advised that she had tested positive for the COVID virus and Dr. Patel put her on Paxlovid, a very strong antiviral medication. Counsel has not yet been retested for the COVID virus, however, she has remained very sick both from the symptoms of the virus and some side effects from the Paxlovid medication. Earlier this week, Counsel saw Dr. Patel, who ordered further testing. All those tests have been conducted, except a chest x-ray which Counsel is scheduled to have tomorrow, November 17, 2022, at 11:30 A.M.

Counsel expects to have a follow-up COVID test by the end of this week. Dr. Patel, has currently diagnosed Counsel as having bronchitis and has put her on additional medications to help her breath better and to help control her coughing.

The Appendix for this appeal has been compiled and printed. It is ready to file with the Petition for Writ of Certiorari in this matter. Counsel would have completed the remaining work on the Petition for Writ of Certiorari had she not been sick and experiencing multiple symptoms including severe fatigue, headaches, a bad cough, sore throat, joint aches and blurred vision from either the medications she has been taking or the COVID virus itself. When Counsel filed her Petition to Reinstate this PCR appeal, she had not been sent a copy of the lab report on her PCR COVID test, but had been notified of the results directly by her internist. Counsel now has that report and is sending a copy of the results along with this Status Report. She has also attached a copy of her prescription for Paxlovid. Counsel is not suggesting that this Honorable Court would doubt her word on these issues, however, she wishes to provide documentation to verify her assertions. I have not contacted opposing counsel in this matter, Megan H. Jameson and Russell Barlow, as the State has already entered a Return to Counsel's Motion to Reinstate this PCR Appeal in which they indicated that they were not taking a position on this request. Counsel hopes to be able to serve and submit her Petition for Writ of Certiorari in this case, and the Appendix thereto, no later than Tuesday, November 22, 2022. She will do so earlier if she possibly can. Counsel acknowledges that the timing of her completion of this Certiorari Petition depends to a degree on the results of medical testing which she has not yet received. Counsel is, of course, respectfully mindful that the Court has not yet ruled upon the Petition to Reinstate currently pending before this Honorable Court. She will submit these documents to the Court in order to demonstrate that they

have been completed and served. It is her prayer that these documents will be accepted for filing out of time.

Respectfully submitted,

TARA DAWN SHURLING
Attorney at Law
SC Bar No. 5099

Law Office of Tara Dawn Shurling, P.A.
3614 Landmark Drive
Suite A
Columbia, S.C. 29204

(803)738-8622 Office Phone
(803)446-3614 Business Cell Phone

tdshurling@aol.com

ATTORNEY FOR PETITIONER

This _____ day of November, 2022