

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Certiorari to Richland County
M. Rita Metts, Circuit Court Judge
Appellate Case No. 2022-000679

RECEIVED

Mar 13 2023

S.C. SUPREME COURT

ROOSEVELT DOCTOR, #186661,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

**FOURTH MOTION FOR AN EXTENSION OF TIME
IN WHICH TO PREPARE, SERVE AND FILE
THE PETITION FOR WRIT OF CERTIORARI AND APPENDIX
IN THE ABOVE CAPTIONED PCR APPEAL**

The Petition for Writ of Certiorari and Appendix in this matter are due for service and filing on today's date; March 13, 2023. Undersigned Counsel has received three previous extensions in this PCR Appeal. The first was due to the fact that Counsel was unaware that she needed to expressly request that Petitioner's time limits be run from the date she was substituted as counsel of record. At this time, undersigned I ask this Honorable Court to take into consideration the fact that in the first two of my previous extensions, I only requested fifteen (15) additional days. As mentioned above, this would only be my second extension request had I asked that the time limits for this PCR appeal be run from the date I became counsel of record in this matter and had I requested a full thirty (30) days in first extension request. Counsel apologizes for wasting the administrative resources of the Court by first neglecting to include the necessary language in her Motion for Substitution of Counsel and thereafter, for being overly optimistic and only requests fifteen (15) days in her first and second requests. Counsel now requests an additional thirty (30) day extension of time in which to serve and file the Petition for Writ of Certiorari and Appendix in this appeal. I have discussed his request with opposing counsel, Julianna E. Battenfield, Esquire, who advises that, in keeping with their current policy on extensions, she is taking no position regarding this request.

Respectfully submitted,

s/ *Tara D. Shurling*

Tara Dawn Shurling

Attorney at Law

SC Bar No. 5099

Julianna E. Battenfield, Esquire