

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

RECEIVED

Apr 13 2023

S.C. SUPREME COURT

ROOSEVELT DOCTOR, #186661,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

**FOURTH PETITION 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; April 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 counsel asks this Honorable Court to take into consideration the fact that in her first two of her precious extensions, she only requested fifteen (15) additional days. As mentioned above, this would only be her third extension request had she asked that the time limits for this PCR appeal be run from the date she became counsel of record in this matter and had she requested a full thirty days in her first two extension requests. 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 is aware that this request requires extraordinary circumstances and hopes the Court will recognize her current circumstances as such. I always have severe allergy problems this time of year and they have been even worse than usual this season. I have had blurred vision and headaches on a daily basis from sinus congestion. This annual problem has been made much worse this year by the fact that I am still not fully recovered from my second round of COVID and some side effects from her reaction to a strong antiviral medication called Paxlovid. My paralegal has been on a much deserved long vacation and that has made it difficult to finish the Petition itself since I am not a particularly good typist.

I am grateful to say that I am finally improving and feel better than I have in months. I would greatly appreciate the Court's consideration in this matter. I am requesting 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. If allowed this additional time, I will try to complete this Certiorari Petition and Appendix sooner than that if possible. I have not discussed this request with

opposing counsel, Julianna E. Battenfield, Esquire, inasmuch as I am aware that their current policy on extensions requires that she take no position extension requests.

Respectfully submitted,

s/ *Tara D. Shurling*

Tara Dawn Shurling

Attorney at Law

SC Bar No. 5099

Julianna E. Battenfield, Esquire