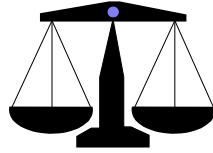


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S.C. SUPREME COURT

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August 1, 2023

The Honorable Patricia A. Howard
Supreme Court of South Carolina
Clerk of Court
1231 Gervais Street
Columbia, SC 29201

Re: Ashley Tavelle Prior, SCDC No. 00290973, Appellate Case No. 2022-000564

Dear Ms. Howard,

I am requesting a third extension of time in which to file the Amended Petition for Writ of Certiorari in this matter. I was substituted as counsel in this matter and granted leave to file an Amended Petition for Writ of Certiorari on May 16, 2023. The Appellate case management system reflects that I have been granted *two extensions since I was substituted in this matter*. In that time I have gotten and reviewed extensive mental health records for Mr. Prior and have reviewed the Appendix and the *Johnson* Certiorari Petition filed by previous counsel. To be fully candid with the Court, I have received a total of 76 days in continuances since I was substituted as Counsel in this matter; so my two extensions have been the equivalent of *two thirty day extensions plus an additional 16 days*.

I have outlined the Amended Petition and intended to finish it and file it today. I have come to the conclusion that as an officer of the court I just do not feel comfortable filing this particular Amended Certiorari Petition without going to see this client. With COVID numbers on the rise, I had hoped to avoid going to see this client face to face, but with his mental health history, I just don't think I can do what I need to do virtually. In most PCR appeals it is not technically necessary to go see the Client. On the facts of this case, however, I just don't feel comfortable doing it without going to see him. I won't try to give the Court this client's entire history in this letter, but suffice it to say his father is alleged to have gotten him started smoking crack at the age of twelve. He has been diagnosed as having multiple personality disorder, episodes of psychosis and is on approximately a dozen medications. My genuine concern is that with his mental health history, it is very possible he does not understand what is going on with his case and more specifically, the risks he is taking moving forward.

The Honorable Patricia A. Howard
Clerk of Court
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August 1, 2023

I am leaving Columbia tomorrow for Marlboro County to work on three pending cases of mine there. I expect to get back from Bennettsville late Friday afternoon. This client is housed at the Gilliam Psychiatric Unit which is inside Kirkland Correctional Institution. I am trying to arrange a meeting with him for over the weekend or Monday. I am asking that I be granted **fourteen (14)** more days to visit this inmate, to discuss his history with a forensic psychiatrist, to further discuss his situation with his Mother and to file the Amended Certiorari Petition if I feel comfortable that he is competent to decide to move forward. All together the requested additional 14 days added to my other two extensions will amount to **a total of 90 days in extensions**, the equivalent of three, 30 day extensions, since I was substituted as counsel in this case on May 16, 2023.

I hate asking for even a third extension in this case when I am working as hard as I can to finish up all my currently pending cases, but this is a compelling case that needs my attention and best advice. I simply can't do that in the blind on this case. I just realized I drafted this as a letter and should have formatted it as a petition since this is a third extension request. I will come to the office in the morning before I leave town and format this as a petition. For now, I will file it as a letter to avoid missing the current deadline.. I will be most grateful for the Court's consideration in this matter. I remain,

Sincerely,

s/ *Tara D. Shurling*

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/ts

Cc: William M. Blich, Jr., Assistant Deputy Attorney General