

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Edward W. Miller, Circuit Court Judge

Appellate Case No. 2012-212508

BRANDI LYNN TURNER-HOLDER, 313870,
A/K/A BRANDI LYNN TURNER,

v.

STATE OF SOUTH CAROLINA,

RECEIVED
AUG 08 2013
S.C. SUPREME COURT
PETITIONER,

RESPONDENT.

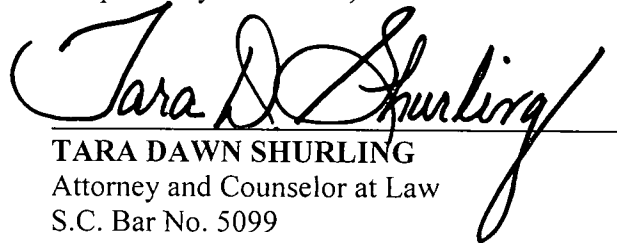
**PETITIONER'S MOTION
FOR EXTENSION OF TIME**

THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petitioner's Reply to State's Return to the Petition for Writ of Certiorari is due for filing on today's date. I had hoped to have this reply completed by today, but my unusually busy schedule has kept me from doing so. Last week I was in Beaufort in Court on Monday, July 29th, for a hearing. I have a client in a murder case that was scheduled to go to trial on today's date and although I am under Order of Protection for August 6, 2013 – August 9, 2013, I was tied up last week with conferences concerning the potential use of my client, and two of his sisters, in the co-defendant's trial this week. I was at the Solicitor's office all afternoon Thursday for witness interviews with an investigator for the Solicitor's Office. Today I have a hearing in a court-appointed PCR case involving a murder conviction and twenty-four (24) allegations. I also had a status conference with Judge Benjamin scheduled in another matter. Tomorrow I have to go to Lexington to review a file for a PCR hearing scheduled for August 15th. When I leave there, I am scheduled to go to the Campbell Pre-Release Center, SCDC, to interview the client for that case. In addition to all this, I have two proposed orders due in the next few days as well. On Wednesday, August 7, 2013, I leave for San Francisco, California, for the Women's Bar Leadership Summit. I sincerely regret having to ask for a third extension in

this matter however, it is important that I have time to fully review the State's Return and make an appropriate Reply. My recent schedule had simply not permitted me an opportunity to do so. I respectfully request a ten (10) day extension of time in which to prepare and submit my Reply to the State's Return to the Petition for Writ of Certiorari on behalf of this client.

Since this is my third extension request, I have asked opposing counsel, Karen C. Ratigan, Assistant Attorney General to sign this motion, in advance of filing it, indicating her consent to my request. (In compliance with *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, S. C. Sup. Ct. Order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1). I no longer have an associate in my law firm, and therefore can not have another lawyer in my firm certify the necessity of the extension. I sincerely hope not to need any further extensions for this PCR appeal. I genuinely appreciate the Court's consideration and patience in this matter.

Respectfully submitted,

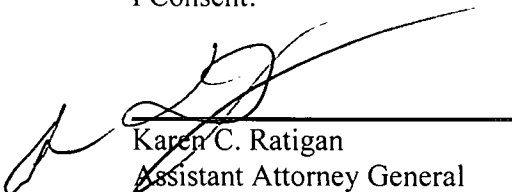


TARA DAWN SHURLING
Attorney and Counselor at Law
S.C. Bar No. 5099

ATTORNEY FOR PETITIONER

August 5, 2013

I Consent:



Karen C. Ratigan
Assistant Attorney General

STATE OF SOUTH CAROLINA
In The Supreme Court

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Appellate Case No. 2012-212508

BRANDI LYNN TURNER-HOLDER, 313870,
A/K/A BRANDI LYNN TURNER,

PETITIONER,

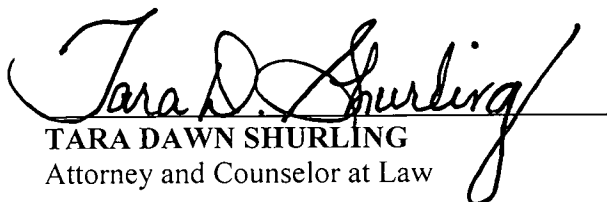
v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the Petitioner's Motion for Extension of Time in the above-entitled case have been served upon opposing counsel, Karen C. Ratigan, Assistant Attorney General, by depositing in the U.S. Mail, postage prepaid, this 5th day of August, 2013.


TARA DAWN SHURLING
Attorney and Counselor at Law

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 5th day
Of August, 2013.


Notary Public for South Carolina

My Commission Expires: 2/28/2023

LAW OFFICE OF



TARA DAWN SHURLING, PA

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

E-Mail: tdslaw@shurlinglaw.com

RECEIVED

AUG 08 2013

(803) 738-8622
S.C. SUPREME COURT
(803) 738-1600

August 5, 2013

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RE: Brandi Lynn Turner-Holder, 313870, A/K/A Brandy Lynn Turner v. State of South Carolina;
2010-CP-23-3160.
Appellate Case No. 2012-212508

Dear Mr. Shearouse:

Enclosed for filing please find the original of the Petitioner's Motion for Extension of Time and my Certificate of Service in the above-captioned case. I would appreciate your returning two (2) clocked copy of the Motion in the envelope provided. Thank you for your assistance in this matter. I remain,

Sincerely yours,

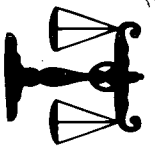
A handwritten signature in cursive script that reads "Tara D. Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm

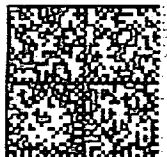
Enclosures

cc: Karen C. Ratigan, Assistant Attorney General (w/enclosures)
Brandi Lynn Turner-Holder, 313870 (w/enclosures)
Benjamin Holder (w/enclosures)



Law Office of
Tara Dawn Shurling, P.A.
Attorney and Counselor at Law
3614 Landmark Dr., Suite A
Columbia, South Carolina 29204

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The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RE: Brandi Lynn Turner-Holder

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