

STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM UNION COUNTY  
Court of General Sessions  
The Honorable John C. Hayes, III, Circuit Court Judge

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SEP 25 2013

SC Court of Appeals

Appellate Case No. 2013-000060

STATE OF SOUTH CAROLINA,

RESPONDENT.

v.

JASON TRAMMELL

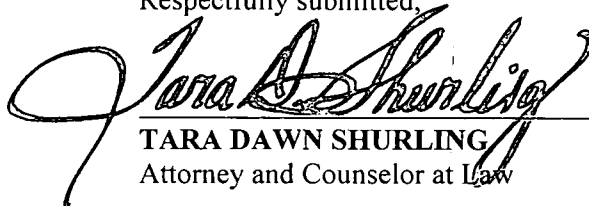
APPELLANT.

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

This case involves a direct appeal from Union County. My Initial Brief and Designation of Matter are due for filing on today's date. Because of my heavy schedule, I will be unable to complete the preparation of these documents by that date and respectfully request a 30-day extension of time in which to prepare and submit the Initial Brief and Designation of Matter on behalf of this client.

Since this is my third extension request, opposing counsel, Salley W. Elliott, Assistant Deputy Attorney General has signed this motion. (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.

Respectfully submitted,

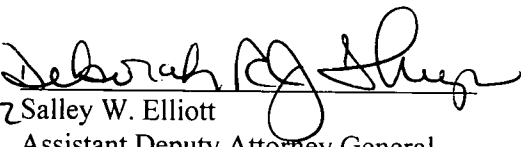


TARA DAWN SHURLING  
Attorney and Counselor at Law

ATTORNEY FOR APPELLANT.

September 23, 2013

I CONSENT:

  
for Salley W. Elliott  
Assistant Deputy Attorney General

STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM UNION COUNTY  
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STATE OF SOUTH CAROLINA,

RESPONDENT.

v.

JASON TRAMMELL,

APPELLANT.

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that a copy of the Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of the Matter in the above-entitled case have been served upon opposing counsel, Salley W. Elliott, Assistant Deputy Attorney General, by depositing in the U.S. Mail, postage prepaid, this 23<sup>rd</sup> day of September, 2013.

*Sharon McCollister*

Sharon McCollister

Paralegal to Tara Dawn Shurling, Attorney for Appellant

SWORN TO BEFORE me this 23<sup>rd</sup> day  
of September, 2013.

*Dyanne Graham* (L.S.)

Notary Public for South Carolina

My Commission Expires: 2/28/23

**RECEIVED**

SEP 25 2013

**SC Court of Appeals**

LAW OFFICE OF



**TARA DAWN SHURLING, PA**

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September 23, 2013

The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: State of South Carolina v. Jason Trammell; Appellate Case No. 2013-000060.

Dear Ms. Kitchings:

Enclosed please find for filing the original and six (6) copies of a Motion for Extension to File Initial Brief in the above captioned matter. The Initial Brief and Designation of the Matter is due for filing on today's date. Since this is my third extension request I have obtain a consent signature from opposing counsel on the enclosed Motion. With my thanks for the Court's kind assistance in this matter, I remain,

Yours sincerely,

A handwritten signature in black ink that reads "Tara Dawn Shurling". The signature is written in a cursive, flowing style.

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm

cc: Salley W. Elliott, Assistant Deputy Attorney General (w/enclosures)  
Jason Trammell, 311049 (w/enclosures)  
Paulette Trammell (w/enclosures)

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