

STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

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Appellate Case No. 2013-000060

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RECEIVED

OCT 28 2013

SC Court of Appeals

STATE OF SOUTH CAROLINA,

RESPONDENT.

v.

JASON TRAMMELL

APPELLANT.

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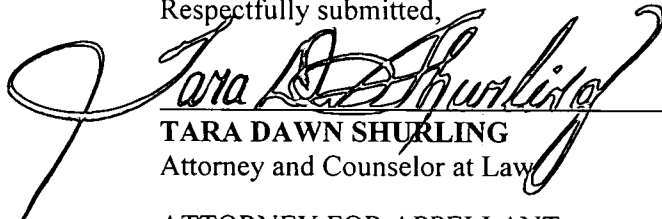
**APPELLANT'S MOTION  
FOR EXTENSION OF TIME**

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This case involves a direct appeal from Union County. My Initial Brief and Designation of Matter are due for filing on today's date. However, after extensively reviewing the trial record I have concluded that it would be in the client's best interest to withdraw his direct appeal and pursue collateral review through a Post-Conviction Relief action. Unfortunately, I will not have time today to obtain an affidavit from the client documenting his decision in this matter. For that reason, I am respectfully requesting a fourth thirty (30) day extension in this matter. I will consult with the client concerning this decision immediately and will provide the Court with an affidavit documenting his request to withdraw this direct appeal or an Initial Brief before that thirty (30) day extension expires.

Counsel for the State has verified their consent to this request by their signature below. (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,



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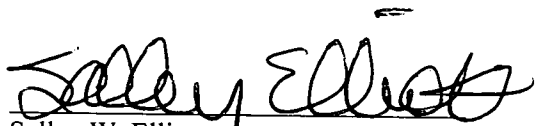
TARA DAWN SHURLING  
Attorney and Counselor at Law

ATTORNEY FOR APPELLANT.

October 23, 2013

October 23, 2013

I CONSENT:

A handwritten signature in black ink, appearing to read "Salley Elliott", written over a horizontal line.

Salley W. Elliott

Senior Assistant Deputy Attorney General

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**CERTIFICATE OF SERVICE**

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, Senior Assistant Deputy Attorney General, by depositing in the U.S. Mail, postage prepaid, this 23<sup>rd</sup> day of October, 2013.

*Sharon McCollister*

Sharon McCollister

Paralegal to Tara Dawn Shurling, Attorney for Appellant

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

*Dyane Graham* (L.S.)

Notary Public for South Carolina

My Commission Expires: 2/28/2023

LAW OFFICE OF



**TARA DAWN SHURLING, PA**

Attorney and Counselor at Law

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October 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 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 fourth extension request I have obtained 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 fluid and cursive, with the first name being the most prominent.

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm

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

**RECEIVED**

OCT 28 2013

**SC Court of Appeals**