

LAW OFFICE OF



RECEIVED

MAR 03 2014

TARA DAWN SHURLING, PA

S.C. SUPREME COURT

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: tdslaw@shurlinglaw.com

February 26, 2014

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

RE: Christopher Woody v. State of South Carolina; Appellate Case No. 2013-001686.

Dear Mr. Shearouse:

I have been retained in the above captioned pending Post-Conviction Relief appeal. I enclose a Motion for Substitution of Counsel for filing as well as a proposed Consent Order of Substitution of Counsel, signed by Susan Hackett, Counsel of Record, and myself. My staff has spoken with opposing counsel, Rutledge Johnson, Assistant Attorney General, and he has consented to this substitution. I have sent another copy of the Motion and Consent Order for Substitution of Counsel to the client at Perry Correctional Institution and will forward the signed copies of both to the Court as soon as they are returned to me.

I am being provided with the Appendix previously compiled by SCCID and would therefore ask that the due date for the Petition for Writ of Certiorari be set from the filing date of this Order of Substitution. As soon as I receive the Appendix and review it, I will advise the Court immediately if I feel necessary matter has been omitted from the Appendix provided to me by SCCID. Please advise me if there is anything further I need to do to facilitate this substitution. With my thanks for your assistance in this matter, I remain,

Sincerely yours,

A handwritten signature in black ink that reads "Tara D. Shurling". The signature is fluid and cursive.

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm
Enclosures

cc: Susan Hackett, Appellate Defender, SCCID
Rutledge Johnson, Assistant Attorney General
Christopher Woody, 309141
Regina Moore

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM YORK COUNTY
Court of Common Pleas

The Honorable John C. Hayes, III, Circuit Court Judge

Appellate Case No. 2013-001686

RECEIVED

MAR 03 2014

S.C. SUPREME COURT

CHRISTOPHER WOODY,

PETITIONER,

v.

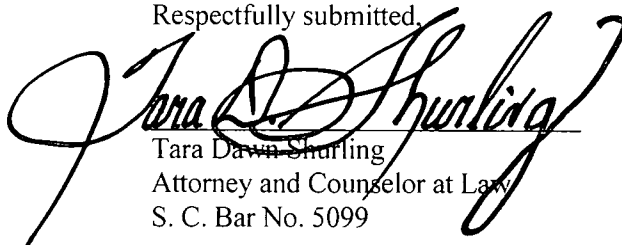
THE STATE OF SOUTH CAROLINA,

RESPONDENT.

MOTION FOR SUBSTITUTION OF COUNSEL

NOW COMES the Petitioner in the above captioned Post-Conviction Relief appeal asking that undersigned counsel, Tara Dawn Shurling, be substituted as counsel of record in this matter. The Notice of Appeal in this case was filed on August 8, 2013, appealing the May 24, 2013 Order of Dismissal and the July 26, 2013 Order Denying Rule 59(e) Motion to Alter or Amend, both issued by the Honorable John C. Hayes, III. The Petition for Writ of Certiorari is due on March 10, 2014. Undersigned counsel was hired on February 24, 2014 by the Petitioner's family to appeal to the Supreme Court of South Carolina. For this reason, the Petitioner now asks that Attorney Shurling be substituted for Susan Hackett, Appellate Defender, as counsel of record in this Post-Conviction Relief appeal. Attorney Hackett has indicated her consent to this substitution by her signature below. Opposing Counsel, Rutledge Johnson, Assistant Attorney General, has indicated his consent to this substitution by his signature below. Counsel has also sent another copy of the Consent Order for Substitution of Counsel to the client at Perry Correctional Institution. Counsel will forward the signed copy of the Consent Order to the Court as soon as it returned to her. Wherefore the Petitioner respectfully asks Tara Dawn Shurling be substituted as counsel of record for his Post-Conviction Relief appeal, and that Susan Hackett be relieved of any further responsibilities in this matter.

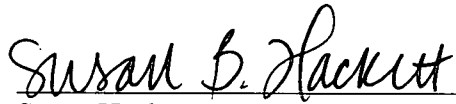
Respectfully submitted,



Tara Dawn Shurling
Attorney and Counselor at Law
S. C. Bar No. 5099

3614 Landmark Drive
Suite A
Columbia, S.C. 29204
(803)738-8622
(803)738-1600 Fax

I consent:




Susan Hackett
Appellate Defender
S. C. Commission on Indigent Defense
Division of Appellate Defense
S.C. Bar No. 71238

I consent:

Christopher Woody, 309141

I consent:



Rutledge Johnson
Assistant Attorney General
S.C. Bar No. 7887

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM YORK COUNTY
Court of Common Pleas

The Honorable John C. Hayes, III, Circuit Court Judge

Appellate Case No. 2013-001686

CHRISTOPHER WOODY,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

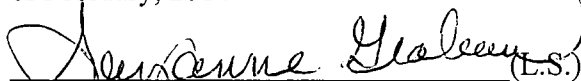
The undersigned hereby certifies that one copy of the Motion for Substitution of Counsel in the above captioned case have been served upon opposing counsel, Rutledge Johnson, Assistant Attorney General, by mailing in an envelope properly addressed to the Office of the Attorney General, P. O. Box 11549, Columbia, SC 29211, with postage prepaid on this the 26th day of February, 2014.



Sharon McCollister
Paralegal to:
Tara Dawn Shurling
Attorney for the Appellant

3614 Landmark Drive
Suite A
Columbia, S.C. 29204
(803)738-8622
(803)738-1600 Fax

SWORN TO BEFORE me this 26th day
of February, 2014


(L.S.)

Notary Public for South Carolina

My Commission Expires: 2/28/2024

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM YORK COUNTY
Court of Common Pleas

The Honorable John C. Hayes, III, Circuit Court Judge

Appellate Case No. 2013-001686

CHRISTOPHER WOODY,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that one copy of the Motion for Substitution of Counsel in the above captioned case have been served upon Susan Hackett, Appellate Defender, by mailing in an envelope properly addressed to the SCCID, Division of Appellate Defense, P. O. Box 11433, Columbia, SC 29211-1433, with postage prepaid on this the 26th day of February, 2014.



Sharon McCollister

Paralegal to:

Tara Dawn Shurling

Attorney for the Appellant

3614 Landmark Drive

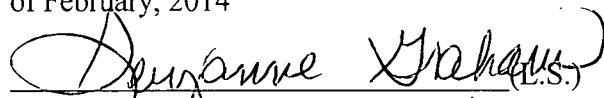
Suite A

Columbia, S.C. 29204

(803)738-8622

(803)738-1600 Fax

SWORN TO BEFORE me this 26th day
of February, 2014



Notary Public for South Carolina

My Commission Expires: 2/28/2024

STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

MAR 03 2014

APPEAL FROM YORK COUNTY
Court of Common Pleas

S.C. SUPREME COURT

The Honorable John C. Hayes, III, Circuit Court Judge

Appellate Case No. 2013-001686

CHRISTOPHER WOODY,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT.

CONSENT ORDER FOR SUBSTITUTION OF COUNSEL

The Petitioner has asked that Tara Dawn Shurling be substituted as counsel of record in the above-captioned Post-Conviction Relief appeal. This appeal is currently being perfected by Susan Hackett, Appellate Defender, of the South Carolina Commission on Indigent Defense, Division of Appellate Defense. Tara Dawn Shurling has been retained by the Petitioner's family as counsel in this case. Counsel Shurling, Attorney Hackett and the Petitioner have indicated their consent to this substitution by their signatures below. Counsel for the Respondent, Rutledge Johnson, Assistant Attorney General has indicated his consent to this substitution by his signature below as well. Inasmuch as all parties concerned have consented to the substitution requested, Tara Dawn Shurling is hereby substituted as counsel of record in the above captioned appellate matter. Susan Hackett, Appellate Defender, is hereby relieved of any further responsibilities concerning this appeal.

IT IS SO ORDERED.

Daniel E. Shearouse

By: _____
Clerk

This _____ day of _____, 2014.

WE CONSENT:

Susan B. Hackett

Susan Hackett
Appellate Defender
S. C. Commission on Indigent Defense
Division of Appellate Defense
S.C. Bar No. 71238

This 26th day of February, 2014.

Tara Dawn Shurling

Tara Dawn Shurling
Attorney and Counselor at Law
S.C. Bar No. 5099

This 26th day of February, 2014.

Christopher Woody, #309141

This _____ day of _____, 2014.

Rutledge Johnson

Rutledge Johnson
Assistant Attorney General
S.C. Bar No. 78871

This 26th day of February, 2014.