

LAW OFFICE OF



**TARA DAWN SHURLING, PA**

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**RECEIVED**

MAR 27 2014

**S.C. SUPREME COURT**

(803) 738-8622

(Fax) (803) 738-1600

March 24, 2014

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

RE: Susan Tappeiner, 338050, v. State of South Carolina  
Appellate Case No. 2013-001885.

Dear Mr. Shearouse:

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

Sincerely yours,

A handwritten signature in black ink that reads "Tara Dawn Shurling". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm

Enclosures

cc: Ashleigh R. Wilson, Assistant Attorney General (w/enclosure)  
Susan Tappeiner (w/enclosure)  
David & Diane Sanders (w/enclosure)

STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
Perry M. Buckner, Circuit Court Judge

Appellate Case No. 2013-001885

SUSAN TAPPEINER, 338050,

v.

THE STATE OF SOUTH CAROLINA,

**RECEIVED**

MAR 27 2014

**S.C. SUPREME COURT**

PETITIONER,

RESPONDENT.

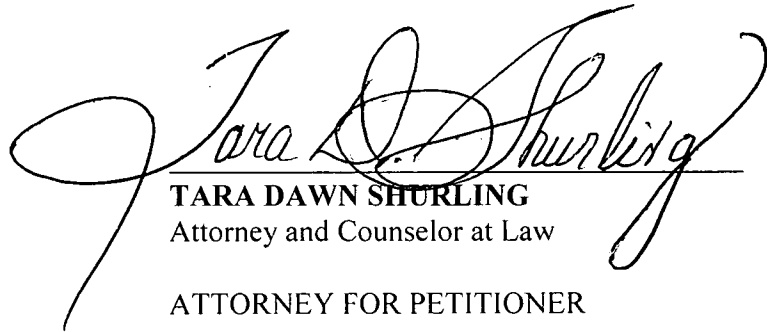
**PETITIONER'S MOTION  
FOR EXTENSION OF TIME**

**THIS MATTER** comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for Writ of Certiorari is due for filing on March 24, 2014. I had two complex Post-Conviction Relief involving murder charges scheduled for last week. One of those cases went forward, and the other was continued due to unavailable witnesses. Today I had a Rule 59(e) Motion due, and a lengthy telephone conference with a client's family, Immigration Attorney and an Interpreter. Because of these matters I was unable to complete my final draft on this Petition by today's date. I had hoped that I would be able to file this Petition today, and had the Appendix delivered to the Court this afternoon. Because my other scheduled obligations today took longer than I anticipated and I was not able to complete my final draft of this Petition today, I now respectfully request a 4-day extension of time in which to prepare and submit my Petition for Writ of Certiorari on behalf of this client.

Since this is my fifth extension request, I have asked opposing counsel, Ashleigh R. Wilson, Assistant Attorney General, to consent to this motion. I have spoken with Ms. Wilson by telephone and she has graciously consented to this request. Because it did not become evident that I could not finish this Certiorari Petition this evening until late this afternoon I was not able to obtain her signature on this motion. I am providing her a copy of this motion by mail, and have requested that she indicate her consent by signature below and forward the same to the Court. (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 would have only requested one additional day in which to file this Petition were it not for the fact that I am heavily booked for Tuesday and Wednesday of this week, and may not get to complete this Petition until Thursday, March 27, 2014. For that reason, I do not anticipate any further extension request for this stage of this PCR appeal.

Respectfully submitted,



**TARA DAWN SHURLING**  
Attorney and Counselor at Law  
ATTORNEY FOR PETITIONER

I Consent:

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Ashleigh R. Wilson  
Assistant Attorney General

STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas  
Perry M. Buckner, Circuit Court Judge

Appellate Case No. 2013-001885

SUSAN TAPPEINER, 338050,

PETITIONER,

v.

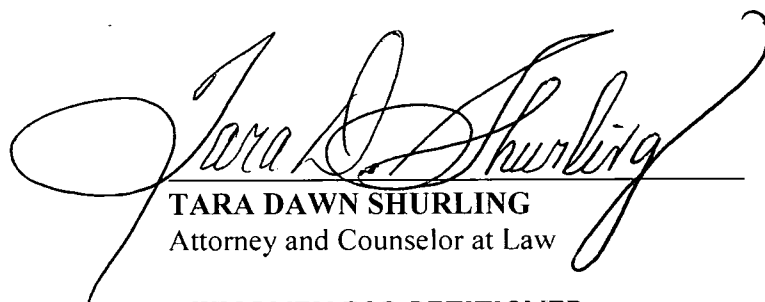
STATE OF SOUTH CAROLINA,

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 has been served upon opposing counsel this the 24<sup>th</sup> day of March, 2014, by email and by mailing one (1) copy in a stamped envelope properly addressed to:

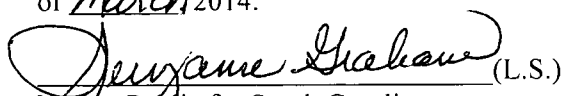
Ashleigh R. Wilson  
Assistant Attorney General  
Office of the Attorney General  
P. O. Box 11549  
Columbia, SC 29211  
[arwilson@scag.gov](mailto:arwilson@scag.gov)



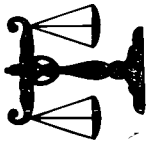
TARA DAWN SHURLING  
Attorney and Counselor at Law

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 24<sup>th</sup> day  
of March 2014.



(L.S.)  
Notary Public for South Carolina  
My Commission Expires: 2/28/2024

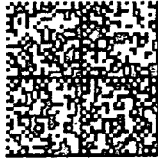


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The Honorable Daniel E. Shearouse  
Clerk, Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

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