

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

AUG 08 2014

S.C. SUPREME COURT

CHRISTOPHER ALLEN WOODY, 309141,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

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

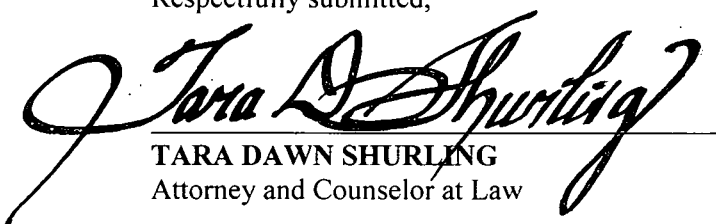
THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for Writ of Certiorari is due for filing on August 7, 2014. Because of my heavy schedule I have been unable to complete this Petition prior to tomorrow's date. This murder case involves numerous complex collateral claims of ineffective assistance of both trial and appellate counsel. The trial record in this matter is 854 pages long. Tomorrow I leave for Boston to represent the South Carolina Women Lawyers Association at the annual conference of the National College of Women's Bar Associations. Within the last thirty days I also attended the National Association of Women Lawyers annual conference on behalf of SCWLA. Unfortunately, my schedule over the last four months has been unusually heavy and I have had numerous lengthy proposed orders due in other complex PCR matters. For these reasons, I now respectfully request a 30-day extension of time in which to prepare and submit my Petition for Writ of Certiorari on behalf of this client. Given that this is my fifth extension request, I would ask for less than a thirty day extension were it not for the fact that my schedule for the next few weeks remains extremely full and I want to insure that no further extension requests for this stage of this PCR appeal will be necessary.

Counsel is extremely mindful that this is her fifth extension request in this PCR appeal. As a matter of policy, I try hard not to seek more than three extensions in any appeal and I would not do so now were it avoidable. Counsel has worked on weekends, and well into the evenings, in recent weeks trying to avoid unnecessary delays in her pending appellate matters. Regrettably, this particular PCR appeal has required far more time than I had anticipated and despite working until midnight Tuesday

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night and nearly that late tonight, I have not been able to complete this Certiorari Petition. Unfortunately, I did not conclude that completing this Petition tonight would not be feasible until it was too late to obtain consent from opposing counsel, Rutledge Johnson, Assistant Attorney General. I will contact Attorney Johnson by telephone tomorrow before my flight to Boston and will ask that he convey his position on this request directly 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 thank the Court for its patience and assistance.

Respectfully submitted,



TARA DAWN SHURLING
Attorney and Counselor at Law

I Consent:

ATTORNEY FOR PETITIONER

Rutledge Johnson
Assistant Attorney General

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CHRISTOPHER ALLEN WOODY, 309141,
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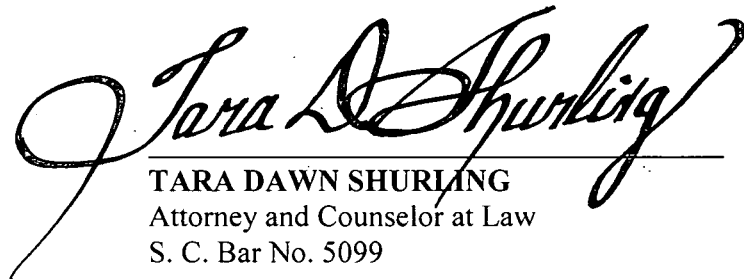
v.

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 7th day of July, 2014, by mailing one (1) copy in postage prepaid envelope properly addressed to:

Rutledge Johnson
Assistant Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, SC 29211



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

ATTORNEY FOR PETITIONER.

LAW OFFICE OF



TARA DAWN SHURLING, PA

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E-Mail: tdslaw@shurlinglaw.com

August 6, 2014

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AUG 08 2014

S.C. SUPREME COURT

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

RE: Christopher Allen Woody, 309141 v. State of South Carolina;
Appellate Case No.: 2013-001686

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 extra copy enclosed in the envelope provided. I am really sorry to ask for another extension in this PCR appeal. Unfortunately, I simply had no choice. I am trying to get caught up from a series of extremely complex PCR cases as well as several murder cases I have been defending in General Sessions Court. I appreciate the Court's patience with me. I did not give up on completing this petition until tonight and have not gotten consent from opposing counsel yet. I will contact, Rutledge Johnson by telephone before my flight leaves tomorrow and will ask him to convey his position on this request directly to the Court by signing a copy of this Motion and forwarding it to the Court. 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 written in a cursive, flowing style.

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/ts
Enclosures

cc: Rutledge Johnson, Assistant Attorney General (w/enclosures)