

LAW OFFICE OF



TARA DAWN SHURLING, PA

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

E-Mail: tdslaw@shurlinglaw.com

(803) 738-8622

(Fax) (803) 738-1600

September 24, 2014

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

RECEIVED

SEP 24 2014

SC Court of Appeals

RE: Ex Parte: Tara Dawn Shurling, Attorney, Appellant.
In Re: State of South Carolina v. Bejay Harley
Appellate Case No. 2013-001298.

Dear Ms. Kitchings:

I am Attorney/Appellant in the above referenced appeal. I have been trying to put together the Record on Appeal for the above captioned matter. This is an appeal from the circuit court's ruling on Appellant's request for payment of her fees and expenses as court-appointed counsel. The Record on Appeal is due today. Unfortunately, I have been unable to locate a copy of a document requested by me in my Designation of the Matter.

I submitted to the lower court a **Reply** to a proposed Order that was submitted to Judge Manning by SCCID on March 14, 2013. Since I can't find a copy of that Reply, I am not positive what date it was served on SCCID and submitted to Judge Manning. Somehow my file copy of that Reply has been lost. It may have been misfiled, but the bottom line is that, despite an exhaustive search, my staff and I have been unable to locate it. I know I served Hugh Ryan at SCCID with this document. I requested a copy of this Reply from Mr. Ryan, however, he has advised me that he doesn't have a copy in his file either. This document is referenced in my briefs so I obviously had it at some point in the appeal process, but now I can't seem to locate it in the hard file. To make matters worse, my digital copy of this Reply was lost when I accidentally saved a subsequent Motion to Reconsider over this Reply in the computer file. Apparently, I pulled up the Reply to format the motion and inadvertently saved the motion over the Reply!

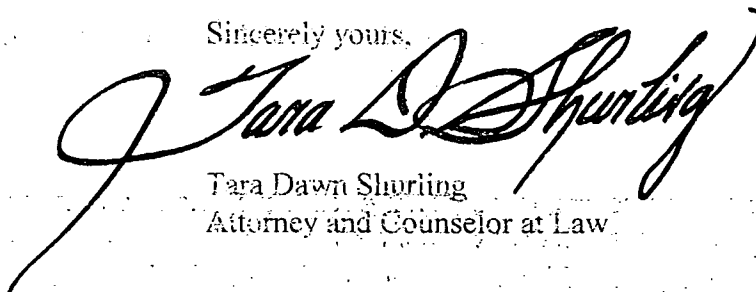
We are diligently searching all my files for this document. I have asked Judge Manning's law clerk to check the judge's file in this matter to see if she can locate a copy for me. Judge Manning's former law clerk, Adam Ribock, would have been keeping the judge's file at the time, but his current clerk, Eve Goodstein, has graciously agreed to see if she can locate a copy for me. I frankly can't recall for certain whether my Reply was submitted in letter form *or* as a formal document. As this concerned a billing matter, most of these documents were not filed with the Clerk of Court's Office. We checked the Clerk of Court's file just to be sure and it was not filed.

X
15/1

The Honorable Jerry A. Kitchings
Clerk, South Carolina Court of Appeals
September 22, 2014
Page 2 of 2

I sincerely apologize for this confusion. I am asking for a thirty day extension of time in which to file this Record on Appeal. If I can't locate a copy of this document by the end of that time period, I will advise the Court, file the Record on Appeal without this document and will modify my brief(s) as needed to delete references to that document. With my thanks for the Court's kind assistance and understanding in this matter, I remain,

Sincerely yours,

A handwritten signature in black ink, reading "Tara Dawn Shurling". The signature is fluid and cursive, with a large initial "T" and "S".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm
Enclosures

cc: Hugh Ryan, Deputy Director and General Counsel SCCID (w/enclosures)



Law Office of
Tara Dawn Shurling, P.A.
Attorney and Counselor at Law
3614 Landmark Dr., Suite A
Columbia, South Carolina 29204

HAND DELIVERY

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

RECEIVED

SEP 24 2014

SC Court of Appeals