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TARA DAWN SHURLING, PA

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

S.C. SUPREME COURT

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: tdslaw@shurlinglaw.com

October 20, 2014

The Honorable Daniel E. Shearouse
South Carolina Supreme Court Clerk
Post Office Box 11330
Columbia, South Carolina 29211-1330

Re: Kevin C. Bradley v. State of South Carolina; 2013-CP-45-098.

Dear Mr. Shearouse:

Enclosed please find for filing a Notice of Appeal in the above captioned Post-Conviction Relief matter along with proof of service on opposing counsel. This Notice addresses the client's intent to appeal the Order of Dismissal issued by Judge Cothran in this matter. This PCR action was filed in connection with a guilty plea entered following Applicant's jury trial on other charges. This client filed a second PCR in that jury trial. The evidentiary hearings on both cases were heard on the same date before the same judge. I have received an Order of Dismissal in that case, however I had to file a Motion pursuant to Rule 59(e), SCRCP in that action docketed at 2010-CP-45-389. That post-hearing motion is still pending. I will file my Notice of Appeal in that action as soon as I receive the Court's Order on the Rule 59(e).

I already obtained a transcript from the PCR hearing held on this case. I would therefore ask that my time limits for filing the Petition for Writ of Certiorari be run from the date the Notice of Appeal is filed.

I was originally hired by this client's mother to handle his circuit court PCR actions only. My fee agreement expressly *excluded* representation in any subsequent PCR appeal unless a separate fee was paid. Sadly, the client's mother has since passed away. I am advised by the client that his father will be hiring me for the PCR appeals, however, the father has not yet hired me nor has he confirmed that he intends to do so. By separate correspondence I have advised the client and his father that I must have his decision within ten (10) days. I will, of course, advise the Court of their decision as quickly as I know myself.

I enclose an extra copy of my Notice of Appeal which I would appreciate having clocked and returned to me in the self-addressed stamped envelope provided. For now, I thank you as always for your assistance and remain,

Sincerely yours,

A handwritten signature in black ink, appearing to read "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sg

Enclosure

cc: Daniel Gourley, Assistant Attorney General
Lorienne French, Legal Service Coordinate, Appellate Defense
Kevin Bradley, #339031
Carol Bradley