

LAW OFFICE OF



TARA DAWN SHURLING, PA

Attorney and Counselor at Law

3614 Landmark Drive

Suite D

Columbia, South Carolina 29204

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: tdslaw@shurlinglaw.com

November 20, 2014

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

RECEIVED

NOV 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:

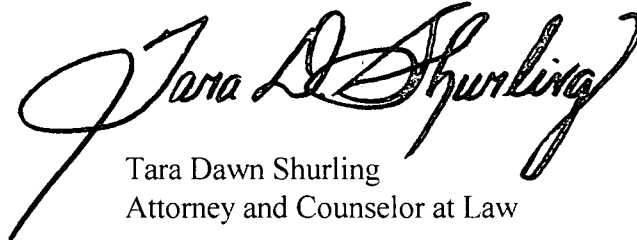
Enclosed for filing please find the original and 14 copies of the Final Brief of Appellant, the original and 14 copies of the Final Reply Brief of Appellant, as well as my Certificate of Service on Opposing Counsel, Hugh Ryan, Director and General Counsel, SCCID. The original, and 14 copies of the Record on Appeal were hand-delivered to the Court earlier this afternoon. The Record on Appeal was served on opposing counsel on October 23, 2014 and a Certificate of Service was mailed to the Court on that date. Opposing Counsel was served with copies of the pages added to the Record on Appeal along with these Final Briefs. That service is referenced in the Certificate of Service for the Final Brief of Appellant and the Final Reply Brief of Appellant.

In the Initial Brief of Appellant I cited to the billing records submitted to the lower court and to SCCID. Through a clerical oversight the SCCID Voucher, and my time records submitted with that voucher, were inadvertently left off Appellant's Designation of the matter. Appellant's Record on Appeal was sent to opposing counsel for his review on October 23, 2014 and he subsequently approved it as containing all the matter contained in his designation of the matter. He did not cite to the billing records omitted from Appellant's Designation of the Matter in his Final Brief which was filed on November 12, 2014. In preparing my own Final Brief, Appellant discovered this oversight and contacted opposing counsel and asked if he would have any objection to her adding this material, clearly cited in Appellant's Brief, to the end of the Record on Appeal. By return email, opposing counsel indicated that he would consent to the documents in question being added to the Record on Appeal provided that this addition did not change the pagination of the portions of the Record on Appeal cited in Respondent's Final Brief. I attach a copy of Mr. Ryan's email to this correspondence. The SCCID voucher, and accompanying time records, have been added to the end of the material originally included in the draft Record on Appeal and have been added to the Index to the Record on Appeal. The inclusion of this material in this manner has not changed the pagination of the portions of the Record on Appeal cited by Respondent in any way.

The Honorable Jenny A. Kitchings
Appellate Case No. 2013-001298
November 20, 2014
Page 2 of 2

We would appreciate your clocking and returning the extra copies of the briefs in the enclosed self-addressed envelope. With my best regards, I remain,

Sincerely yours,

A handwritten signature in black ink, reading "Tara Dawn Shurling". The signature is written in a cursive style with a large, sweeping initial "T".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/SM

Enclosures

cc: J. Hugh Ryan, III, Deputy Director and General Counsel SCCID (w/enclosures via U.S. Mail)

TDSLAW

From: Hugh Ryan [hryan@sccid.sc.gov]
Sent: Thursday, November 20, 2014 11:13 AM
To: tdslaw@shurlinglaw.com
Subject: harley

Tara:

I do not have any objection to you adding the time records however as you are aware of filed by final brief last week so there can be no renumbering of the pages.

I would say it is up the Court how they want it done.

Hugh

RECEIVED

NOV 24 2014

SC Court of Appeals

Law Office of

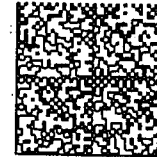
TARA DAWN SHURLING, PA


3614 LANDMARK DRIVE, SUITE D
COLUMBIA, SOUTH CAROLINA 29204



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

FIRST-CLASS



UNITED STATES POSTAGE
PITNEY BOWES
\$006.50
02 1P
0002929654 NOV 20 2014
MAILED FROM ZIP CODE 29204