

STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas  
The William Jeffrey Young, Circuit Court Judge

Appellate Case No. 2012-213366

RECEIVED

DEC 19 2014

S.C. SUPREME COURT

LEON A. GOODMAN, 321501,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

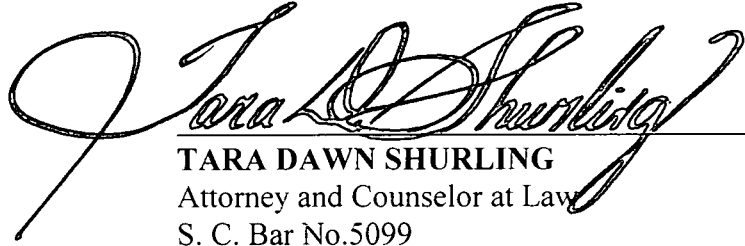
**PETITIONER'S MOTION  
FOR EXTENSION OF TIME**

**THIS MATTER** comes before the Court by way of an appeal from a Post-Conviction Relief Order. As this Court is aware, I did not represent Petitioner in the circuit court and was court-appointed in this matter by Order dated September 24, 2014. The Brief of Petitioner is due for filing on December 29, 2014. Unfortunately, I have been out of work with the flu for two weeks. I have been able to work very little since I became ill on December 3, 2014. I was able to return to work Monday, however, due to my illness, I will be unable to complete this Brief by the due date. My support staff will be off from December 19<sup>th</sup> through January 2<sup>nd</sup>. Regrettably, I do not believe I will be able to complete this brief before their last day; December 18<sup>th</sup>. Having had the flu for two weeks I am in all candor not certain how much I will be able to work this week either. For that reason, I now respectfully request a 30-day extension of time in which to prepare and submit my Brief of Petitioner on behalf of this client.

Since this is my third extension request, I have asked opposing counsel, Megan E. Harrigan, Assistant Attorney General, to consent to this extension by her signature below. (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

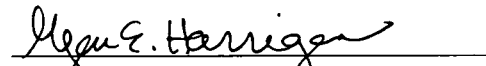
law firm, and therefore can not have another lawyer in my firm certify the necessity of the extension. I will do my best to avoid any further extension requests for this stage of this PCR appeal.

Respectfully submitted,

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

ATTORNEY FOR PETITIONER

I Consent:

  
Megan E. Harrigan  
Assistant Attorney General  
S. C. Bar No. 100108

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Appellate Case No. 2012-213366

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LEON A. GOODMAN, 321501,

PETITIONER,

v.

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RESPONDENT.

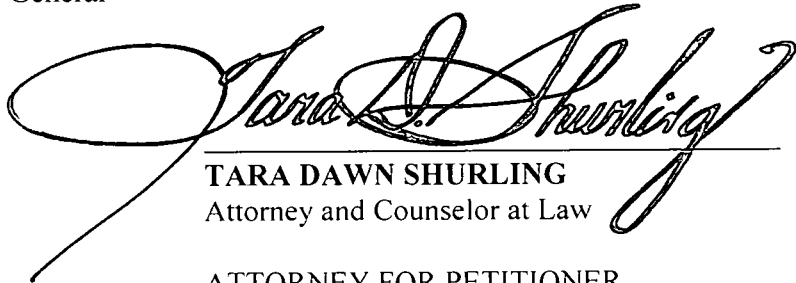
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**CERTIFICATE OF SERVICE**

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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 17<sup>th</sup> day of December, 2014, by mailing one (1) copy in a stamped envelope properly addressed to:

Megan E. Harrigan  
Assistant Attorney General  
Office of the Attorney General  
P. O. Box 11549  
Columbia, SC 29211

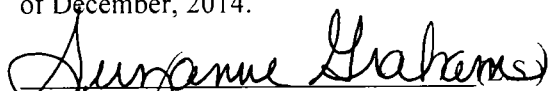


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**TARA DAWN SHURLING**  
Attorney and Counselor at Law

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 17<sup>th</sup> day  
of December, 2014.

  
Notary Public for South Carolina  
My Commission Expires: 2/28/24

LAW OFFICE OF



**TARA DAWN SHURLING, PA**

Attorney and Counselor at Law

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(Fax) (803) 738-1600

E-Mail: [tdslaw@shurlinglaw.com](mailto:tdslaw@shurlinglaw.com)

December 17, 2014

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

RE: Leon A. Goodman, 321501, v. State of South Carolina;  
Appellate Case No. 2012-213366

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. Thank you for your assistance in this matter. I remain,

Sincerely yours,

A large, stylized handwritten signature in black ink that reads "Tara Dawn Shurling".

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm  
Enclosures

cc: Megan E. Harrigan, Assistant Attorney General (w/enclosures)  
Leon A. Goodman, 321501 (w/enclosures)  
Gloria Ann Goodman (w/enclosures)

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**S.C. SUPREME COURT**