

STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM WILLIAMSBURG COUNTY  
Court of Common Pleas  
The Honorable R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2014-001764

**RECEIVED**

JAN 30 2015

**S.C. SUPREME COURT**

KEVIN C. BRADLEY, 339031,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

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

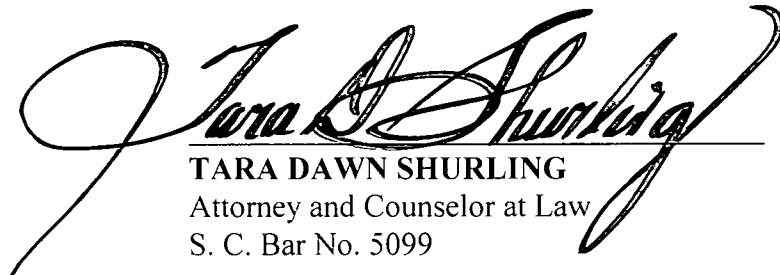
**THIS MATTER** comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for Writ of Certiorari is due for filing on January 29, 2015. Because of the following reasons I am asking for this extension:

The Monday before Thanksgiving I got very sick with a respiratory virus, and was out of work for a week. Although I did not mention my illness in my motion, it was a major factor in my making a first extension request on November 20, 2014. Just as I began to recover from that illness, I came down with the flu despite my annual flu shot. My second extension request was made on December 18, 2014 due to my illness, and the fact that my staff was scheduled to be off December 19<sup>th</sup> through January 2<sup>nd</sup> for the holidays. In truth, I was still sick through the Christmas holidays, and could not have completed this Certiorari Petition over the holidays even if my support staff had been available. Since I returned to work January 5, 2015, I have been working hard to catch up from all the time I missed due to my illness and the holidays. Despite

my best efforts, my heavy court schedule in January, and the backlog that accumulated while I was ill, have prevented me from completing this Certiorari Petition. For these reasons, I very reluctantly ask for a third thirty (30) day extension of time to file this Certiorari Petition. I apologize for the delay, and regret having to ask for the Court's consideration again.

Since this is my third extension request, opposing counsel, Daniel Gourley, Assistant Attorney General has consented to this extension by his 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 do not anticipate any further extension request 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:



\_\_\_\_\_  
Daniel Gourley  
Assistant Attorney General  
S. C. Bar No. 100934

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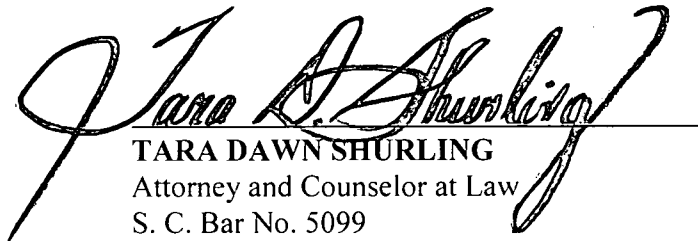
THE STATE OF SOUTH CAROLINA,

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 29<sup>th</sup> day of January, 2015, by mailing one (1) copy in a stamped envelope properly addressed to:

Daniel Gourley  
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.

SWORN TO BEFORE me this 29<sup>th</sup> day  
of January, 2015.

  
(L.S.)

Notary Public for South Carolina

My Commission Expires: 2/28/24

LAW OFFICE OF



**TARA DAWN SHURLING, PA**

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

(803) 738-8622

(Fax) (803) 738-1600

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

January 29, 2015

**RECEIVED**

JAN 30 2015

**S.C. SUPREME COURT**

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

RE: Kevin C. Bradley, 339031, v. State of South Carolina;  
Appellate Case No. 2014-002270

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,

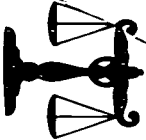
A large, stylized handwritten signature in black ink that reads "Tara Dawn Shurling".

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm

Enclosures

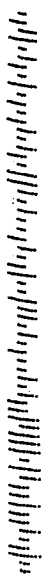
cc: Daniel Gourley, Assistant Attorney General (w/enclosures)  
Kevin C. Bradley, 339031 (w/o enclosures)  
Carol Bradley (w/o enclosures)



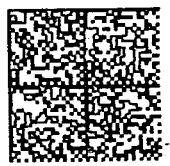
Law Office of  
**Tara Dawn Shurling, P.A.**  
 Attorney and Counselor at Law  
 3614 Landmark Dr., Suite A  
 Columbia, South Carolina 29204

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

RE: Kevin G. Bradley  
 29211-11330 B0598



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