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JAN 30 2015

S.C. SUPREME COURT

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

LEON A. GOODMAN, 321501,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

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

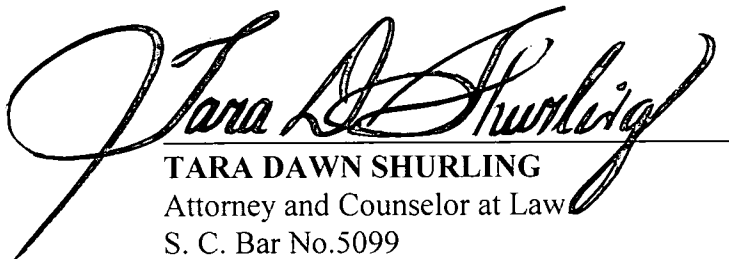
THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. As this Court is aware, I did not represent Petitioner in the circuit court and was court-appointed in this matter by Order dated September 24, 2014. The Brief of Petitioner is due for filing on today's date.

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 second 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 third extension request was made on December 18, 2014 due to my illness, and the fact that my staff was scheduled to be off December 19th through January 2nd 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 Brief of Petitioner. For these reasons, I very reluctantly ask for a fourth thirty (30) day extension of time in which to prepare and submit my Brief of Petitioner on behalf of this client. I apologize for the delay, and regret having to ask for the Court's consideration again.

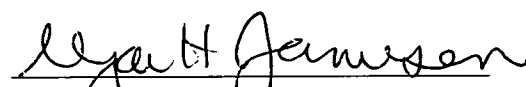
Since this is my fourth extension request, I have asked opposing counsel, Megan H. Jameson, Assistant Attorney General, to consent to this extension by her signature below. (In compliance with *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, S. C. Sup. Ct. Order dated March 18, 2009) (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 H. Jameson
Assistant Attorney General
S. C. Bar No. 100108

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM CLARENDON COUNTY
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Appellate Case No. 2012-213366

LEON A. GOODMAN, 321501,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

The undersigned 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 29th day of December, 2014, by mailing one (1) copy in a stamped envelope properly addressed to:

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

Sharon McCollister

Sharon McCollister,
Paralegal to Tara Dawn Shurling, Attorney for Petitioner

SWORN TO BEFORE me this 29th day
of January 29, 2015.

Marganne Graham
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

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: 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

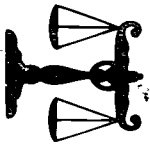
TDS/sm

Enclosures

cc: Megan H. Jameson, Assistant Attorney General (w/enclosures)

Leon A. Goodman, 321501 (w/o enclosures)

Gloria Ann Goodman (w/o enclosures)

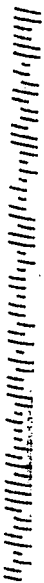


Law Office of
Tara Dawn Shurling, P.A.
 Attorney and Counselor at Law
 3614 Landmark Dr., Suite A
 Columbia, South Carolina 29204

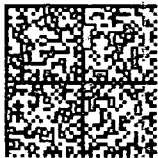
The Honorable Daniel E. Shearouse
 Clerk, Supreme Court of South Carolina
 P.O. Box 11330
 Columbia, SC 29211


RE: Leon A. Goodman

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