

STATE OF SOUTH CAROLINA
In The Supreme Court

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

RECEIVED

MAR 19 2015

Appellate Case No. 2014-001764

S.C. Supreme Court

DIANE ELIZABETH BROWN, 344449,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

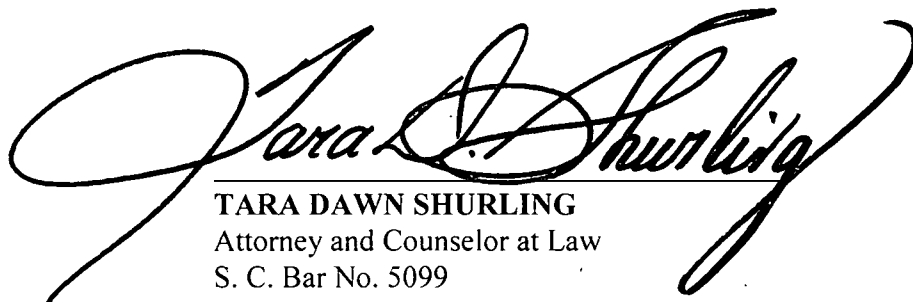
**PETITIONER'S MOTION
FOR EXTENSION OF TIME**

THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. My Petition for Writ of Certiorari in the above captioned matter is due for service and filing on today's date. In addition to this Certiorari Petition, I had a another petition do you today involving another extremely complex Post-Conviction Relief matter. I made every effort to complete both of these Certiorari Petitions by today however several problems this week have prevented me from doing so.

My staff and I arrived at my office Monday morning to discover that the entire office had the strong stench of dead flesh. It was late in the day before the landlord was able to get someone to discover the dead possum that had gotten under my office building and into our heating ducts. They were able to remove the poor dead creature and spread lye under my building, however, the entire episode radically slow down production around here Monday and Tuesday of this week. It is now extremely late and it has become obvious that I will not be able to complete this petition, in addition to the one I am filing in an unrelated case. For that reason, I am forced to ask this Court to grant me one last extension in this matter. I unfortunately have other pressing matters pending the remainder of this week and I am not likely to be able to finish this Certiorari Petition until this

weekend. For that reason, I am respectfully asking that I be granted an extension until Monday, March 23, 2015. I could not obtain opposing counsel's consent to this extension since I did not arrive at the conclusion that I could not press on this evening and complete this petition until after the close of business hours. I will contact opposing counsel in the morning and ask that the State indicate their position on this request directly with the court. Once again I apologize for the necessity to ask for this additional extension and assure the court that this petition will be filed Monday without further delay.

Respectfully submitted,

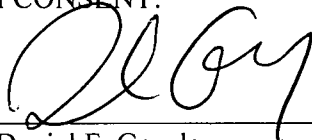


TARA DAWN SHURLING
Attorney and Counselor at Law
S. C. Bar No. 5099

ATTORNEY FOR PETITIONER

This 18th day of March, 2015

I CONSENT:



Daniel F. Gourley
Assistant Attorney General

3/19/15

Date