

STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of General Sessions  
The Honorable J. C. Nicholson, Jr., Circuit Court Judge

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APR 06 2015

SC Court of Appeals

Appellate Case No. 2014-001419

STATE OF SOUTH CAROLINA,

APPELLANT.

v.

JAMES A. SUMMERSETT,

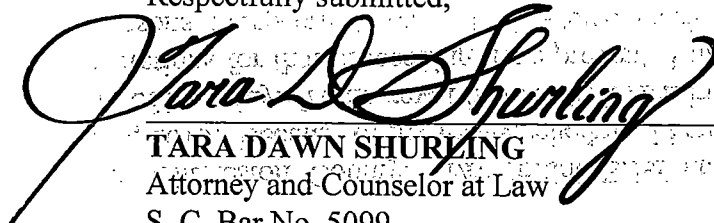
RESPONDENT.

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

This case involves a direct appeal from Charleston County. My Initial Brief and Designation of Matter are due for filing on April 3, 2015. Because of my heavy schedule, I have been unable to complete the preparation of this brief by today. Tomorrow I have a PCR Hearing scheduled in a murder case. Unfortunately, preparations for that proceeding have prevented me from completing this brief this week. For these reasons, I respectfully request a 30-day extension of time in which to prepare and submit the Initial Brief and Designation of Matter on behalf of this client.

Since this is my fourth extension request, opposing counsel, Salley W. Elliott, Senior Assistant Deputy Attorney General has signed this motion. (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 regret having to request a fourth extension and I do not anticipate any further extension request for this stage of this appeal.

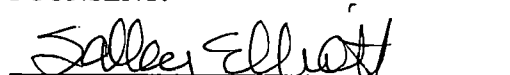
Respectfully submitted,



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

ATTORNEY FOR RESPONDENT.

I CONSENT:



Salley W. Elliott  
Senior Assistant Deputy Attorney General

STATE OF SOUTH CAROLINA  
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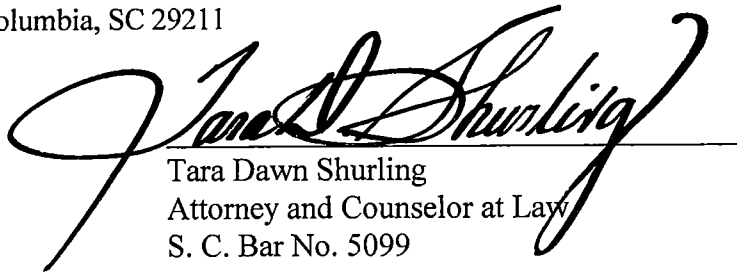
JAMES A. SUMMERSETT,

RESPONDENT.

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a copy of the Respondent's Motion for Extension of Time to File Respondent's Initial Brief and Designation of the Matter in the above-entitled case have been served upon opposing counsel, Salley W. Elliott, Senior Assistant Deputy Attorney General, this 2<sup>nd</sup> day of April, 2015, by mailing one (1) copy in a stamped envelope properly addressed to:

Salley W. Elliott  
Senior Assistant Deputy 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 Respondent.

SWORN TO BEFORE me this 2<sup>nd</sup> day  
of April, 2015.

Sharon H. McCollister (L.S.)  
Notary Public for South Carolina

My Commission Expires: Jan. 16, 2017

LAW OFFICE OF



**TARA DAWN SHURLING, PA**  
Attorney and Counselor at Law  
3614 Landmark Drive  
Suite A  
Columbia, South Carolina 29204

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

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SC Court of Appeals

(803) 738-8622  
(Fax) (803) 738-1600

April 2, 2015

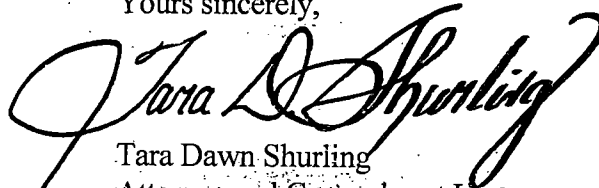
The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: State of South Carolina v. James A. Summersett; Appellate Case No. 2014-001419.

Dear Ms. Kitchings:

Enclosed for filing please find the Respondent'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. With my thanks for the Court's kind assistance in this matter, I remain,

Yours sincerely,

  
Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm

cc: Salley W. Elliott, Assistant Deputy Attorney General (w/enclosures)  
James Summersett, 216032 (w/enclosures)  
Quincy Summersett (w/enclosures)



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

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 SC 290  
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SC Court of Appeals

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

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