

STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas  
J. Cordell Maddox, Jr., Circuit Court Judge

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Appellate Case No. 2014-002623

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**RECEIVED**

APR 10 2015

**S.C. Supreme Court**

RICHARD KEVIN PATTERSON, 270085,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

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

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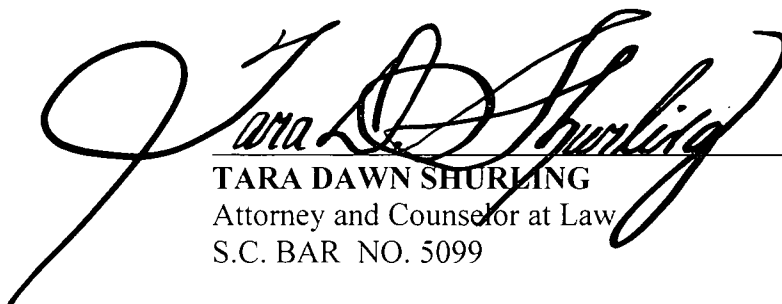
**THIS MATTER** comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for Writ of Certiorari is due for filing on today's date. Because of my heavy schedule I have been unable to complete this Petition by today. I am however extremely close to completely this Petition. Unfortunately, I have other significant commitments tomorrow and Friday which may interfere with my ability to finish up this Petition. For that reason I now respectfully request an additional 5-day extension of time in which to complete and submit my Petition for Writ of Certiorari on behalf of this client. Unfortunately, I have the Appendix for this PCR appeal delivered early today in anticipation of mailing this Petition tonight.

Since this is my fourth extension request, I would have asked opposing counsel, David Spencer, Senior Assistant Attorney General, to consent to this extension request, however, due to hour at which I concluded this request was necessary, I have been unable to obtain his consent in advance of filing this request. I am serving with this Motion and would request that he advise the Court directly of his position. (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. There will be no further extension requests for this stage of this PCR appeal.

Signature Line On Page 2

**Richard Patterson v. State**  
**Petitioner's Motion**  
**For Extension of Time**  
**Page 2 of 2**

Respectfully submitted,

A large, stylized handwritten signature in black ink, reading "Tara Dawn Shurling". The signature is written over a horizontal line.

**TARA DAWN SHURLING**  
Attorney and Counselor at Law  
S.C. BAR NO. 5099

ATTORNEY FOR PETITIONER

This the 8<sup>th</sup> day of April, 2015.

STATE OF SOUTH CAROLINA  
In The Supreme Court

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RICHARD KEVIN PATTERSON, 270085,  
PETITIONER,

v.

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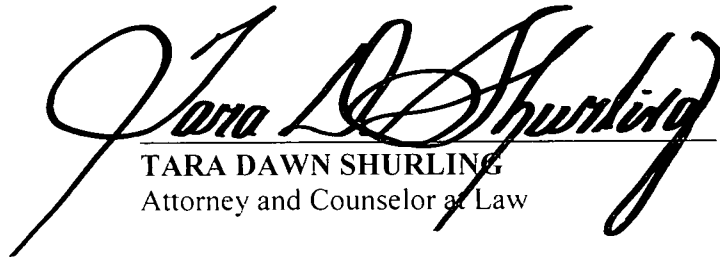
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**CERTIFICATE OF SERVICE**

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

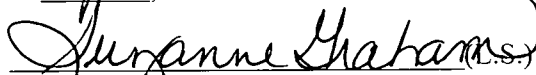
David Spencer  
Senior Assistant Attorney General  
Office of the Attorney General  
P. O. Box 11549  
Columbia, SC 29211



TARA DAWN SHURLING  
Attorney and Counselor at Law

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 8<sup>th</sup> day  
of April 2015.

  
Suzanne Shabam, D.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

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

(803) 738-8622

(Fax) (803) 738-1600

April 8, 2015

**RECEIVED**

APR 10 2015

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

**S.C. Supreme Court**

RE: Richard Kevin Patterson, 270085, v. State of South Carolina;  
Appellate Case No. 2014-002623.

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 two (2) extra copies 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/sg  
Enclosures

David Spencer, Senior Assistant Attorney General (w/enclosure)