

STATE OF SOUTH CAROLINA  
In The Supreme Court

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

Appellate Case No. 2015-000136

RECEIVED

APR 30 2015

S.C. Supreme Court

KEVIN C. BRADLEY, 339031,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

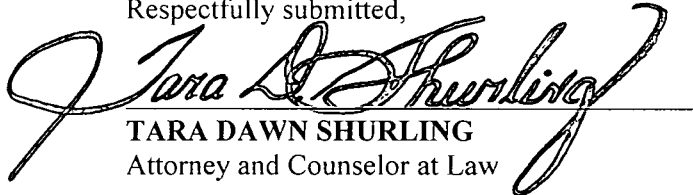
RESPONDENT,

**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 today's date, April 27, 2015. Because of my busy schedule, I have been be unable to complete this Petition by today and, for that reason, I now respectfully request a 30-day extension of time in which to prepare and submit my Petition for Writ of Certiorari on behalf of this client.

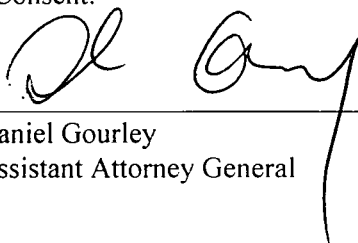
Since this is my third extension request, opposing counsel, Daniel Gourley, Assistant Attorney General has consented to this extension by his signature below. (In compliance with *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, S. C. Sup. Ct. Order dated March 18, 2009) (Davis Adv. Sh. 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

ATTORNEY FOR PETITIONER

I Consent:

  
Daniel Gourley  
Assistant Attorney General

STATE OF SOUTH CAROLINA  
In The Supreme Court

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KEVIN C. BRADLEY, 339031,

PETITIONER,

v.

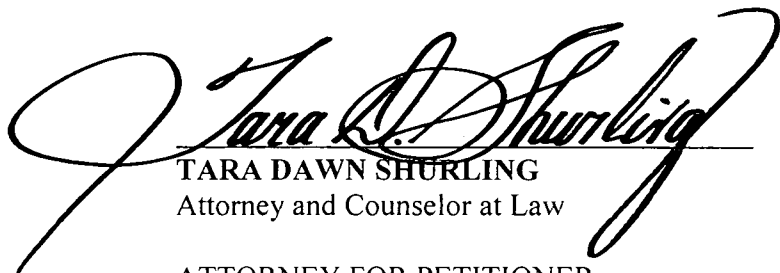
STATE OF SOUTH CAROLINA,

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 27<sup>th</sup> day of April, 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

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 27<sup>th</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

(803) 738-8622

(Fax) (803) 738-1600

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

April 27, 2015

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

**RECEIVED**

APR 30 2015

RE: Kevin C. Bradley, 339031, v. State of South Carolina;  
Appellate Case No. 2015-000136

**S.C. Supreme Court**

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 handwritten signature in cursive script 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/enclosures)  
Carol Bradley (w/out enclosures)