

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

JUN 29 2015

S.C. Supreme Court

KEVIN C. BRADLEY, 339031,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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

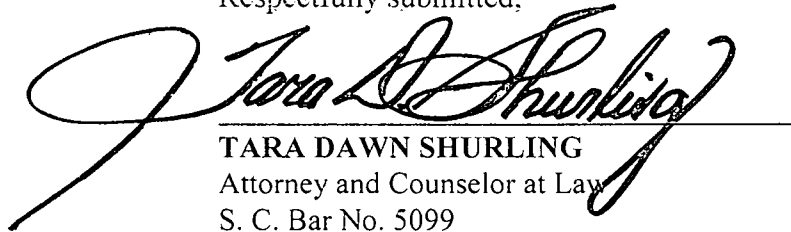
THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for Writ of Certiorari is due for filing on today's date. This petition is nearly complete, however, severe thunderstorms are now moving into the area and Counsel for Petitioner is concerned that she needs to get home before the weather gets worse. For that reason, she now respectfully requests a five (5) day extension of time in which to prepare and submit my Petition for Writ of Certiorari on behalf of this client. I hope to be able to complete this petition tomorrow; however, I am requesting five (5) days to avoid any need for a further extension.

Since it is past normal working hours for the Office of the Attorney General, I am unable to obtain consent for this request from opposing Counsel, Daniel Gourley, Assistant Attorney General. For that reason, I am asking that he convey his position on this request directly to the Court



Monday, June 29, 2015, (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 appreciate the Court's consideration in this matter and do not anticipate any further extension requests for this stage of this PCR appeal.

Respectfully submitted,

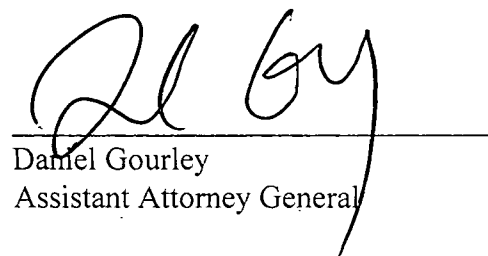


TARA DAWN SHURLING
Attorney and Counselor at Law
S. C. Bar No. 5099

ATTORNEY FOR PETITIONER

This 26th day of June, 2015.

I Consent:



Daniel Gourley
Assistant Attorney General

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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 26th day of June, 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
S. C. Bar No. 5099

ATTORNEY FOR PETITIONER.