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September 14, 2015

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

**RECEIVED**

SEP 15 2015

SC Court of Appeals

Re: State of South Carolina v. Kathy Leonard Revan  
Case Nos. 2011-GS-30-1625; 1626; 1627

Dear Ms. Kitchings:

Last week my paralegal, Sharon McCollister, spoke with someone on your staff concerning this matter in an effort to determine what my briefing schedule would now be following the Court's Order of August 27, 2015 which we received on August 31, 2015. Apparently my staff did not know how to calendar this since that Order was silent as to scheduling.

I have consulted with the owner of CompuScripts concerning this matter, and she has agreed to have one of her court reporters attempt to transcribe these recordings for me. Unfortunately, the cost of having that done is going to be approximately three times the per page price of a regular court reporter. I have contacted Ms. Revan's family concerning the court's ruling, and they are in the process of trying to raise the necessary extra funds to have a private company transcribe these matters. I hope to have funds in my trust account to cover the estimated cost within the next week to ten days. I am simply not in the position to contract with CompuScripts for these transcripts without the funds in hand to cover the bill. The schedule for this brief is further complicated by the fact that CompuScripts cannot give me an estimate as to time required to complete these transcripts until they listen to the recordings.

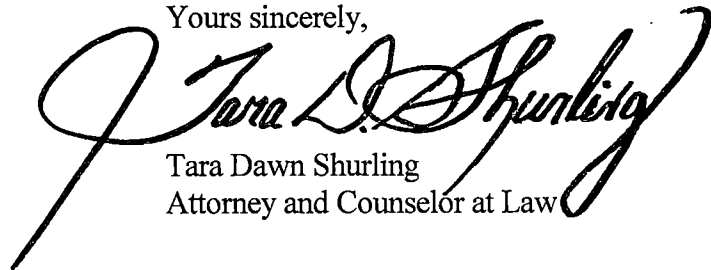
When my paralegal spoke with your staff last week, she was told that my time for filing this brief would have been ten days from the date of the Court's Order and therefore had already expired. As you can see from the language of the Order, nothing about the Order advised me of that fact. Also, the Order indicated that I could have these recordings privately transcribed, and I obviously could not have done that within ten days particularly since I did not get the Order until August 31, 2015. Apparently, my paralegal was told that I would be receiving a letter advising me that I would have to file a Motion to File Initial Brief of Appellant Out of Time. As of today's mail, we have not gotten such a letter.

I realize that this direct appeal is already way off schedule; however, I would respectfully assert that the delay has not been the Appellant's fault and certainly was not for the purpose of

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causing delay. My client is in very poor health and is very anxious to have her appeal heard. On the other hand, the contents of that interview, and the 911 call, will be central to the most important issues to be presented on appeal. At this point I would ask that this appeal be stayed pending my receipt of a private transcription of these two recordings. I propose to copy the Court on my formal request for these transcripts and will make that request just as soon as the funds to pay for it are deposited in my trust account. As soon as CompuScripts gives me a time estimate of the turn around time for getting these recordings transcribed, I will notify the Court of that as well. I will have as much of my work done on this brief as I can without this transcript in advance, and would ask that I be given ten (10) days from receipt of the transcript to file the Initial Brief of Appellant. I attempted to contact Salley Elliott concerning this matter, but she was not available when I called. I would ask that she contact the Court directly concerning her position on this request. With my thanks for your kind attention in this matter, I remain,

Yours sincerely,

A handwritten signature in black ink, reading "Tara Dawn Shurling". The signature is written in a cursive, flowing style with a large initial "T".

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sg

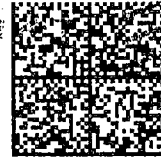
cc: Salley W. Elliott, Senior Assistant Deputy Attorney General  
Kathy Revan, #358569  
Brandon Revan



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