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S.C. SUPREME COURT

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September 5, 2012

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

RE: Brandi Lynn Turner-Holder v. State; 2010-CP-23-3160.

Dear Mr. Shearouse:

I have reviewed the Return filed by the South Carolina Commission on Indigent Defense to my Motion for Expense Funding. Please accept this correspondence as my reply.

This client is clearly indigent, and but for the fees paid by her father, would be represented by the Appellate Division of the South Carolina Commission on Indigent Defense on this Post-Conviction Relief appeal. The fact that her father has been willing to pay my fees should not alter the responsibility of the State to pay the expenses for this appeal. The father has no legal obligation to pay her legal fees. The position taken by the South Carolina Commission on Indigent Defense would result in the State having to bare the burden of paying for *both* a lawyer for her appeal, *and* the cost of the expenses associated with the appeal in any situation where a third party was only able, or willing, to pay for legal fees. I would hope such a position would not be supported by the Court.

I thank the Court for their time in considering this important issue and remain,

Sincerely yours,

A handwritten signature in cursive script that reads "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS /sg

cc: T. Patton Adams, Executive Director for SCCID
J. Hugh Ryan, Esquire, General Counsel for SCCID