

STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of General Sessions
The Honorable Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No. 2014-000161

RECEIVED

NOV 30 2015

SC Court of Appeals

STATE OF SOUTH CAROLINA,

RESPONDENT.

v.

KATHY LEONARD REVAN,

APPELLANT.

APPELLANT'S MOTION
FOR EXTENSION OF TIME

This case involves a direct appeal from Laurens County. My Initial Brief and Designation of Matter are due for filing on today's date, November 30, 2015. Due to extraordinary circumstances, Counsel has no choice but to request one last short extension in this matter. There have been six (6) prior extensions at this stage of this appeal, although Counsel urges the Court to consider that much of the earlier delay was related to lengthy discussions concerning a portion of the record in this matter which was not transcribed by the Court Reporter. Counsel fully expected to be able to finally complete the Initial Brief of Appellant for service and filing today. Counsel planned to use much of the Thanksgiving holiday weekend to complete her work on this brief. Unfortunately, Counsel became ill Friday morning with a bad stomach virus. Although Counsel is much improved and is working today, her paralegal is now out sick with what appears to be the same virus Counsel had over the weekend.

Counsel apologizes to the Court for the need to request this additional extension. Not only does she need additional time to complete this brief, she would not have had her paralegal to type the brief today even if Counsel had managed to complete it over the weekend. Counsel can not recall ever requiring so many extensions in one appeal in her 36 year career. She hopes that the Court will consider the fact that a number of factors, beyond her control, have necessitated the

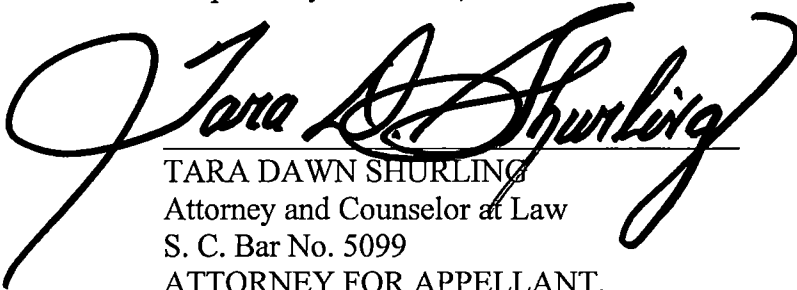
unusual delays requested in this matter; the problems with the transcript, her car accident in late summer, her father's serious medical issues and extended hospitalization, the office closure and damage to her home caused by our recent historic floods and now, a garden variety of stomach virus that has sickened Counsel and her paralegal.

Because Counsel does not know for how long her paralegal will be out sick, she is now asking for an extension of the deadline for this brief until Thursday, December 10, 2015 to prepare and submit the Initial Brief and Designation of Matter on behalf of this client.

Counsel has contacted opposing Counsel, Salley W. Elliott, Senior Assistant Deputy Attorney General, and she has indicated that she has no objection to this extension and leaves this request to the sound discretion of this Honorable Court. Her signature below verifies her consent.


(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 appeal. Counsel very much appreciates the Court's consideration during this difficult time.

Respectfully submitted,


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

November 30, 2015

I CONSENT:


Salley W. Elliott
Senior Assistant Deputy Attorney General

STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

NOV 30 2015

SC Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of General Sessions
The Honorable Eugene C. Griffith, Jr., Circuit Court Judge

Appellate Case No. 2014-000161

STATE OF SOUTH CAROLINA,

RESPONDENT,

v.

KATHY LEONARD REVAN,

APPELLANT.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the Motion for Extension of Time to File Initial Brief and Designation of the Matter in the above-entitled case has been served upon opposing counsel by depositing in the U.S. Mail, postage prepaid, this 30th day of November, 2015, addressed as follows:

Salley W. Elliott
Senior Assistant Deputy 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

SWORN TO BEFORE me this 30th day
of November 30, 2015.

 (L.S.)

Notary Public for South Carolina

My Commission Expires: Jan. 16, 2017

LAW OFFICE OF



RECEIVED

NOV 30 2015

SC Court of Appeals

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

November 30, 2015

VIA HAND-DELIVERY

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

Re: State of South Carolina v. Kathy Leonard Revan;
Appellate Case No. 2014-000161

Dear Ms. Kitchings:

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 copies to my courier. With my thanks for the Court's kind assistance in this matter, I remain,

Yours sincerely,

A large, stylized handwritten signature in black ink that reads "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm

cc: Salley W. Elliott, Senior Assistant Deputy Attorney General (w/enclosures)