

STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM CHARLESTON COUNTY
Court of General Sessions
The Honorable Kristi L. Harrington, Circuit Court Judge

FEB 10 2016
SC Court of Appeals

Appellate Case No. 2015-001662

STATE OF SOUTH CAROLINA,

RESPONDENT.

v.

DEAN NELSON SEAGERS,

APPELLANT.

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

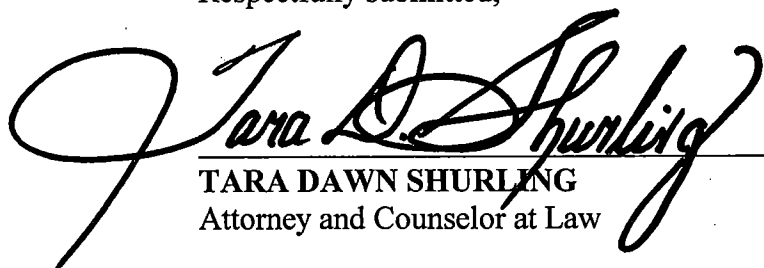
This case involves a direct appeal from Charleston County. My Initial Brief and Designation of Matter are due for filing on today's date, February 8, 2016. Counsel had hoped not to require another extension at this stage of this appeal, however, she has been out of work for much of the past thirty (30) days with bronchitis and has been unable to complete her work on the Initial Brief and Designation of Matter due to her illness and the medications she was taking for her cough while she was ill. For these reasons, she now respectfully requests an additional 30-day extension of time in which to prepare and submit the Initial Brief and Designation of Matter on behalf of Appellant.

Opposing Counsel has graciously consented to this extension request. Since this is the fourth extension request for this stage of this direct appeal, opposing counsel, J. Benjamin Aplin, Interim Senior Assistant Deputy Attorney General, has verified his consent to this extension



request 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. Baring unforeseen circumstances, Counsel does not anticipate any further extension request for this stage of this appeal.


Respectfully submitted,

A large, stylized handwritten signature in black ink, reading "Tara Dawn Shurling". The signature is written over a horizontal line.

TARA DAWN SHURLING
Attorney and Counselor at Law

ATTORNEY FOR APPELLANT.

I CONSENT:

A handwritten signature in black ink, appearing to read "Benjamin Aplin". The signature is written over a horizontal line.

J. Benjamin Aplin
Interim Senior Assistant Deputy Attorney General

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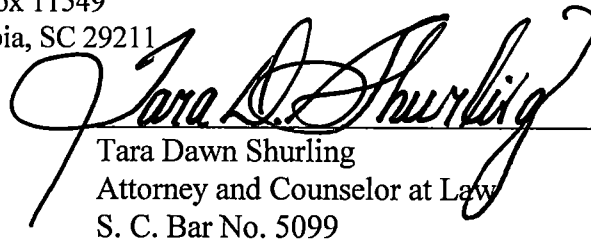
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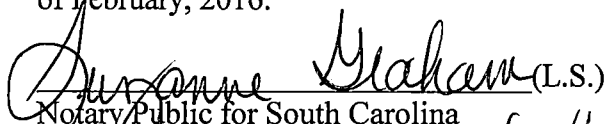
CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the Appellant's Motion for Extension of Time to File Appellant's Initial Brief and Designation of the Matter in the above-entitled case have been served upon opposing counsel, J. Benjamin Aplin, Interim Senior Assistant Deputy Attorney General, this 8th day of February 2016, by mailing one (1) copy in a stamped envelope properly addressed to:

J. Benjamin Aplin
Interim 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 8th day
of February, 2016.


Suzanne Graham (L.S.)
Notary Public for South Carolina
My Commission Expires: 2/28/24

LAW OFFICE OF



TARA DAWN SHURLING, PA
Attorney and Counselor at Law
3614 Landmark Drive
Suite A
Columbia, South Carolina 29204

E-Mail: tDSLAW@shurlinglaw.com

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(803) 738-8622
(Fax) (803) 738-1600

February 8, 2016

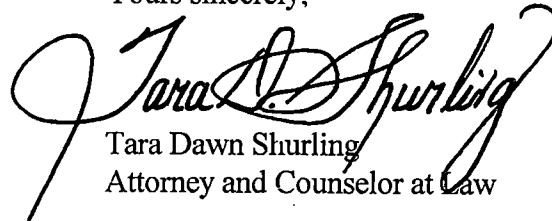
The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: State of South Carolina v. Dean Nelson Seagers; Appellate Case No. 2015-001662.

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 copy enclosed in the envelope provided. With my thanks for the Court's kind assistance in this matter, I remain,

Yours sincerely,


Tara Dawn Shurling
Attorney and Counselor at Law

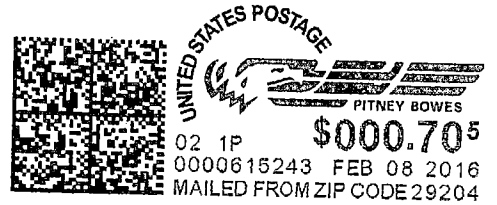
TDS/sm

Enclosures

cc: J. Benjamin Aplin, Interim Senior Assistant Deputy Attorney General (w/enclosures)
Dean Seagers, 294406 (w/enclosures)
Delvaine Seagers (w/enclosures)



Law Office of
Tara Dawn Shurling, P.A.
Attorney and Counselor at Law
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Columbia, South Carolina 29204



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