

STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
W. Jeffrey Young, Circuit Court Judge

Appellate Case No. 2015-002214

**RECEIVED**

MAR 02 2016

QUINTIN LINEN, 238553,

**S.C. SUPREME COURT**  
PETITIONER,

v.

STATE OF SOUTH CAROLINA,

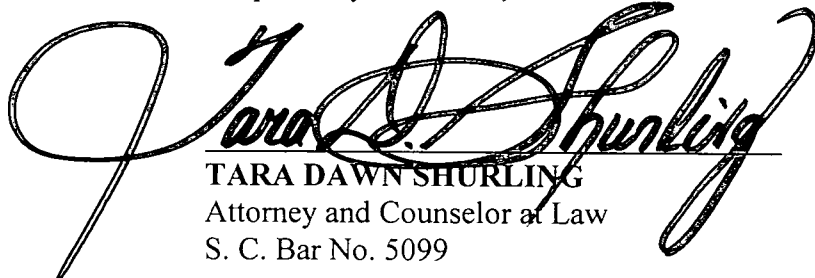
RESPONDENT.

**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 March 1, 2016. Counsel was out of work sporadically for nearly three and a half weeks in January and early February with an unusually bad bout of bronchitis. For this reason, Counsel's usual busy schedule has been exacerbated as she catches up from her illness. She will be unable to complete this Petition by this date and now respectfully requests a 30-day extension of time in which to prepare and submit her Petition for Writ of Certiorari on behalf of this client.

Inasmuch as this is her second extension request, Counsel has contacted opposing counsel, Rutledge Johnson, Assistant Attorney General, and he has verbally consented to this request.

Respectfully submitted,



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

ATTORNEY FOR PETITIONER

February 29, 2016

STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
W. Jeffrey Young, Circuit Court Judge

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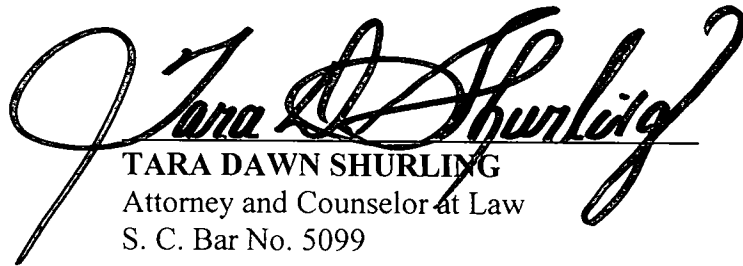
STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

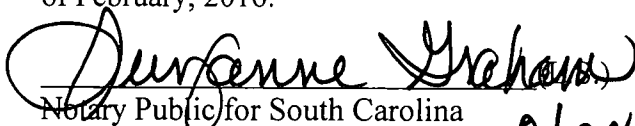
The undersigned attorney hereby certifies that a copy of the Petitioner's Motion for Extension of Time in the above-entitled case has been served upon opposing counsel this the 29<sup>th</sup> day of February, 2016, by mailing one (1) copy in a stamped envelope properly addressed to:

Rutledge Johnson  
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.

SWORN TO BEFORE me this 29<sup>th</sup> day  
of February, 2016.

  
Notary Public for South Carolina

My Commission Expires: 2/28/24

LAW OFFICE OF



RECEIVED

MAR 02 2016

TARA DAWN SHURLING, PA

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

S.C. SUPREME COURT

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: [tdslaw@shurlinglaw.com](mailto:tdslaw@shurlinglaw.com)

February 29, 2016

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

RE: Quintin Linen, 238553, v. State of South Carolina;  
Appellate Case No. 2015-002214.

Dear Mr. Shearouse:

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 two (2) extra copies enclosed in the envelope provided. Thank you for your assistance in this matter. I remain,

Sincerely yours,

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

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm

Enclosures

cc: Rutledge Johnson, Assistant Attorney General (w/enclosures)  
Quintin Linen, 238553 (w/enclosures)  
Angel Linen (w/enclosures)