

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM HORRY COUNTY
Court of Common Pleas
G. Thomas Cooper, Jr., Circuit Court Judge

2015-002511

RECEIVED

MAR 21 2016

S.C. SUPREME COURT

LEMONDE C. HOLLAND,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

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

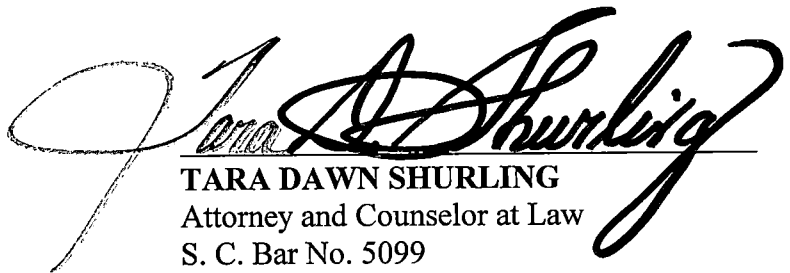
THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for Writ of Certiorari is due for filing on March 17, 2016. My heavy appellate schedule, as well as my court schedule, have prevented me from completing this Petition by today's date. In addition, much of today I will be involved with commitments with the South Carolina Woman Lawyers Association for our annual Awards Reception this afternoon. For these reasons, I now respectfully request a 30-day extension of time in which to prepare and submit my Petition for Writ of Certiorari on behalf of this client.

Since this is my third extension request, opposing counsel, Jessica Kinard, Assistant Attorney General, has consented to this extension. Counsel has sent her a copy of this Extension Petition by email and has requested that she verify her consent to this extension request by her signature on a copy of the petition to be forwarded directly to the Court. (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 PCR appeal.

Respectfully submitted,



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

ATTORNEY FOR PETITIONER.

This the 17th day of March, 2016.

I Consent:

Jessica Kinard
Assistant Attorney General

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Appellate Case No. 2015-002511

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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 17th day of March, 2016, by mailing one (1) copy in a stamped envelope properly addressed to:

Jessica Kinard
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 17th day
of March, 2016.

Sharon H. McCollister (L.S.)

Notary Public for South Carolina

My Commission Expires: Jan 16, 2017

LAW OFFICE OF



TARA DAWN SHURLING, PA

Attorney and Counselor at Law

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Suite A

Columbia, South Carolina 29204

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E-Mail: tdslaw@shurlinglaw.com

March 17, 2016

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MAR 21 2016

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

S.C. SUPREME COURT

RE: Lemonde C. Holland, 322379, v. State of South Carolina;
Appellate Case No. 2015-002511.

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 large, stylized handwritten signature in black ink that reads "Tara Dawn Shurling". The signature is written in a cursive, flowing style.

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm
Enclosures

cc: Jessica Kinard, Assistant Attorney General
Lemonde C. Holland, 322379 (w/enclosures)
James K. Holland (w/enclosures)