

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

MAR 14 2016
SC Court of Appeals

Appellate Case No. 2015-001662

STATE OF SOUTH CAROLINA,

RESPONDENT.

v.

DEAN NELSON SEAGERS,

APPELLANT.

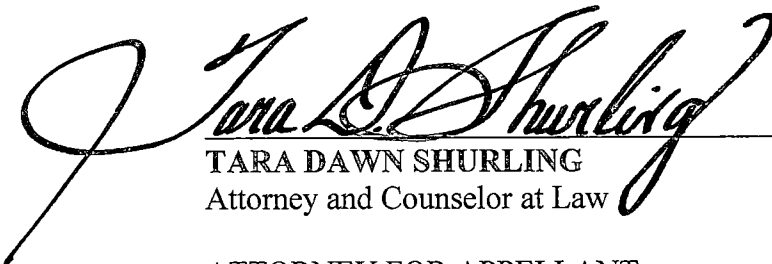
**APPELLANT'S MOTION
FOR EXTENSION OF TIME**

This case involves a direct appeal from Charleston County. My Initial Brief and Designation of Matter are due for filing on today's date, March 9, 2016. Counsel had hoped not to require another extension at this stage of this appeal, however, she has not been able to complete her preparation of this brief by today's date. Counsel was out of work off and on for three and a half weeks in January and February. Counsel has worked diligently to catch up on the matters which accumulated during her illness, and thankfully, is nearly back on schedule. 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, J. Benjamin Aplin, Interim Senior Assistant Deputy Attorney General, has graciously consented to this extension request. Since this is the fifth extension request for this stage of this direct appeal, Counsel has sent him a copy of this Extension Petition

by email and have requested that he verify his consent to this extension request by his 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. Baring unforeseen circumstances, Counsel does not anticipate any further extension request for this stage of this appeal.

Respectfully submitted,



TARA DAWN SHURLING
Attorney and Counselor at Law

ATTORNEY FOR APPELLANT.

This the 9th day of March, 2016.

I CONSENT:

J. Benjamin Aplin
Interim Senior Assistant Deputy Attorney General

Date: _____

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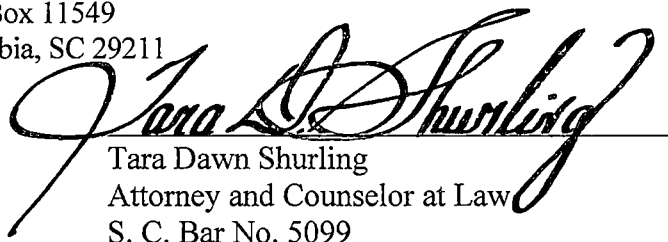
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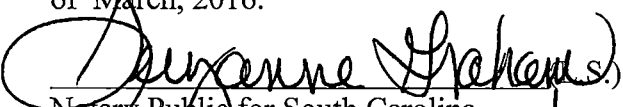
CERTIFICATE OF SERVICE

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 9th day of March 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 9th day
of March, 2016.


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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SC Court of Appeals

(803) 738-8622

(Fax) (803) 738-1600

March 9, 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. I had hoped not to need another extension at this stage of this appeal, however it has proven unavoidable. With my thanks for the Court's kind assistance in this matter, I remain,

Yours sincerely,

A 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: 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
3614 Landmark Dr., Suite A
Columbia, South Carolina 29204

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SC Court of Appeals

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

