

STATE OF SOUTH CAROLINA  
In The Supreme Court

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

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Appellate Case No. 2015-002511

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**RECEIVED**

APR 21 2016

**S.C. SUPREME COURT**

LEMONDE C. HOLLAND,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

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

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**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 April 18, 2016. Due to my unusual heavy court schedule the week of April 18, 2016 I was unable to get the Certiorari Petition completed by today's date. I am scheduled for Post-Conviction Relief hearings in three cases in three different counties this week, and my preparation for those hearings prohibited me from completing my Certiorari Petition in this matter. For this reason, 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 fourth extension request, opposing counsel, Jessica Kinard, Assistant Attorney General has consented to this extension by her 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. 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 18<sup>th</sup> day of April, 2016.

I Consent:



*sw* Jessica Kinard  
Assistant Attorney General

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CERTIFICATE OF SERVICE

The undersigned 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 18<sup>th</sup> day of April, 2016, by depositing one (1) copy of the same in the U.S. Mail, postage prepaid addressed to:

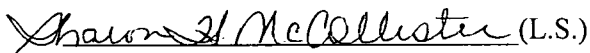
Jessica Kinard  
Assistant Attorney General  
Office of the Attorney General  
P. O. Box 11549  
Columbia, SC 29211



Suzanne Graham  
Paralegal

Law Office of Tara Dawn Shurling, PA  
3614 Landmark Drive, Suite A  
Columbia, SC 29204  
(803) 738-8622

SWORN TO BEFORE me this 18<sup>th</sup> day  
of April, 2016.

 (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

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

(803) 738-8622

(Fax) (803) 738-1600

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

April 18, 2016

**RECEIVED**

APR 21 2016

**S.C. SUPREME COURT**

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

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 extra copy enclosed in the envelope provided. Thank you for your assistance in this matter. I remain,

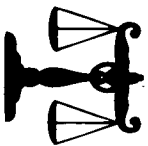
Sincerely yours,

A handwritten signature in black ink that reads "Tara D. Shurling".

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm  
Enclosures

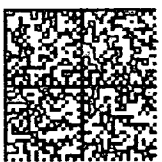
cc: Jessica Kinard, Assistant Attorney General (w/enclosures)  
Lemonde C. Holland, 322379 (w/enclosures)  
James K. Holland (w/enclosures)



Law Office of  
**Tara Dawn Shurling, P.A.**  
Attorney and Counselor at Law  
3614 Landmark Dr., Suite A  
Columbia, South Carolina 29204

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

RE: Lemonde C. Holland



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