

LAW OFFICE OF



TARA DAWN SHURLING, PA

Attorney and Counselor at Law

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May 4, 2016

RECEIVED

MAY - 9 2016

SO SUPREME COURT

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 was unable to speak with opposing counsel concerning this request today. I have therefore asked that he convey his position regarding this request directly to the Court. 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 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: Rutledge Johnson, Assistant Attorney General (w/enclosures)
Quintin Linen, 238553 (w/enclosures)
Angel Linen (w/enclosures)

STATE OF SOUTH CAROLINA
In The Supreme Court

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

2015-002214

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MAY -9 2016

SC SUPREME COURT

QUINTIN LINEN, 238553,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

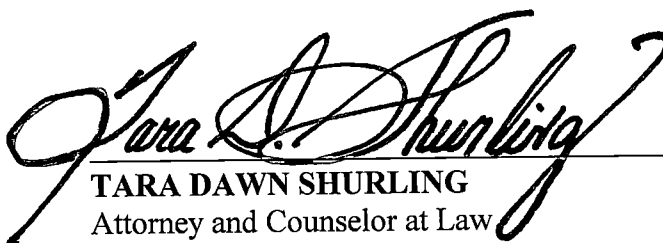
**PETITIONER'S MOTION
FOR EXTENSION OF TIME**

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 May 4, 2016. Due to an unusually heavy Court and appellate schedule, I have not been able to complete this petition by today's date.

Opposing counsel, Rutledge Johnson, has indicated that he does not oppose counsel's request and will leave the matter to the sound discretion of the Court. Counsel has requested that Attorney Johnson confirm his position concerning this request with the Court in writing. (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.

JS

Respectfully submitted,


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

ATTORNEY FOR PETITIONER

Respondent does not oppose this request.

Rutledge Johnson
Assistant Attorney General

STATE OF SOUTH CAROLINA
In The Supreme Court

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MAY - 9 2016

SC SUPREME COURT

APPEAL FROM CHARLESTON COUNTY
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QUINTIN LINEN, 238553,

PETITIONER,

v.

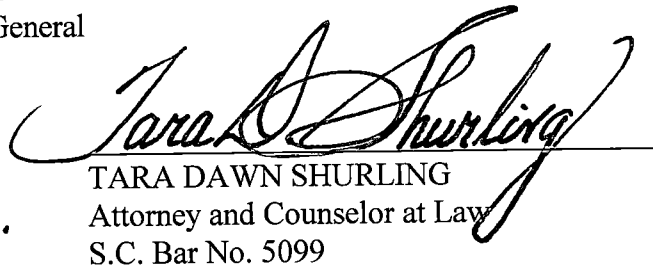
STATE OF SOUTH CAROLINA,

RESPONDENT.

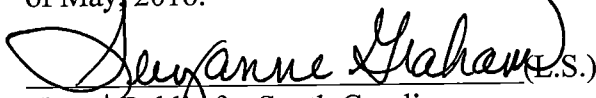
CERTIFICATE OF SERVICE

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 4th day of May, 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

SWORN TO BEFORE me this 4th day
of May, 2016.


Notary Public for South Carolina
My Commission Expires: 2/28/24

TDSLAW

From: Rutledge Johnson [rjohnson@scag.gov]
Sent: Wednesday, May 04, 2016 4:35 PM
To: tdslaw@shurlinglaw.com
Subject: Linen
Attachments: 00982785.PDF

Suzanne,
Attached is the signed copy- our mail has already gone over to the Supreme Court for the day, so you will have to send a copy. Thanks.

-Rutledge



J. Rutledge Johnson
Assistant Deputy
Attorney General

S.C. Attorney General's Office
Rembert C. Dennis Building
Post Office Box 11549
Columbia, South Carolina 29211

Office: (803) 734-3737
Fax: (803) 734-4113
rjohnson@scag.gov

STATE OF SOUTH CAROLINA
In The Supreme Court

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

2015-002214

QUINTIN LINEN, 238553,

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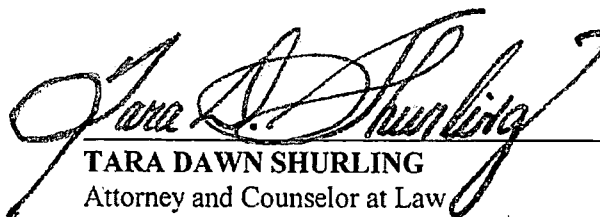
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Respectfully submitted,

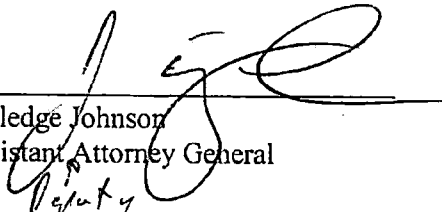


TARA DAWN SHURLING

Attorney and Counselor at Law
S. C. Bar No. 5099

ATTORNEY FOR PETITIONER

Respondent does not oppose this request.



Rutledge Johnson
Assistant Attorney General

Deputy