

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable L. Casey Manning, Circuit Court Judge

Appellate Case No. 2016-000415

RECEIVED

JUL 21 2016

S.C. SUPREME COURT

CLINTON FOLKES, 216506,

PETITIONER,

v.

THE STATE OF SOUTH CAROLINA,

RESPONDENT.

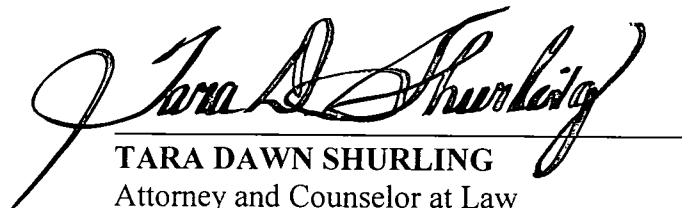
**PETITIONER'S MOTION
FOR EXTENSION OF TIME**

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 today's date. I had planned to complete my work on this certiorari petition the week of the Fourth of July, but unfortunately a major plumbing emergency at my home kept me from doing so. The main sewer line for my street had been replaced the week prior to the fourth of July and unfortunately the company that did the work neglected to reconnect my home to the new line. This oversight caused my finished basement to flood with sewage water. I ended up tied up the entire week determining the source of the flooding, getting the city to dig back up my street and connect my plumbing and then dealing with a cleaning crew at my home. Due to this unexpected delay, I was not able to get this petition done by today's date. For that 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.

Clinton Folkes v. State of South Carolina
Petitioner's Motion for Extension of Time
Page 2

Since this is my third extension request, opposing counsel, Megan Harrigan Jameson, 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.

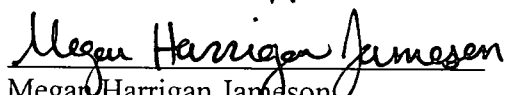
Respectfully submitted,



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

ATTORNEY FOR PETITIONER

I Consent: *do not oppose.*


Megan Harrigan Jameson
Assistant Attorney General

July 18, 2016

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
Honorable L. Casey Manning, Circuit Court Judge

Appellate Case No. 2016-000415

CLINTON FOLKES, 216506,

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 18th day of July, 2016, by mailing one (1) copy in a stamped envelope properly addressed to:

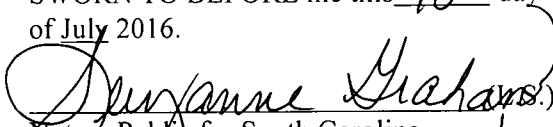
Megan Harrigan Jameson
Assistant Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, SC 29211



TARA DAWN SHURLING
Attorney and Counselor at Law

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 18th day
of July 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

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: tdslaw@shurlinglaw.com

July 18, 2016

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

RE: Clinton Folkes, 216506, v. State of South Carolina;
Appellate Case No. 2016-000415

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 black ink that reads "Tara Dawn Shurling". The signature is fluid and cursive.

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm

Enclosures

cc: Megan Harrigan Jameson, Assistant Attorney General (w/enclosures)
Clinton Folkes, 216506 (w/enclosures)
Lilieth P. Folkes (w/enclosures)

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JUL 21 2016

S.C. SUPREME COURT