

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

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AUG 22 2016

SC 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, however I unfortunately have had an unusually heavy schedule in the past thirty (30) days. I have major pleadings due in federal court in three murder cases in the next five days. My Objections to the Magistrate Judge's Report and Recommendations in one habeas case are due Saturday, August 20, 2016. In addition, I have interviews with clients at Turbeville Correctional Institution tomorrow; Friday, August 19, 2016. I then have Objections in two other habeas matters involving homicide cases due to the U. S. District Court on Monday, August 22, 2016. I am additionally scheduled to be in Court on a probate matter on Wednesday, August 24, 2016. Ordinarily, since I have had three previous extensions, I would only ask for ten (10) days additional time to complete this Certiorari Petition.

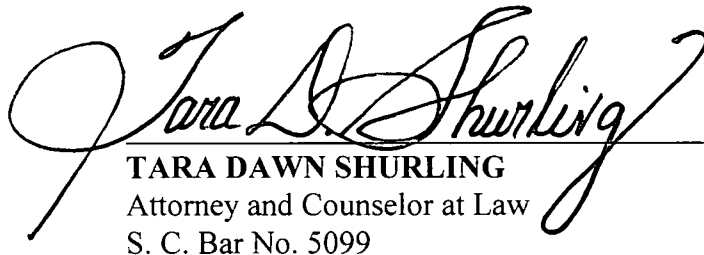


Clinton Folkes v. State of South Carolina
Petitioner's Motion for Extension of Time
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Unfortunately, I have two extremely complex Post-Conviction Relief hearings scheduled for August 30, 2016. For that reason, I am requesting an additional thirty (30) days in which to complete and file this Petition for Writ of Certiorari on behalf of this client. I will make every effort to complete this petition and file it sooner if possible.

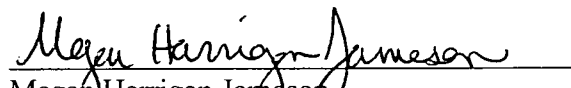
I have spoken with opposing counsel, Megan Harrigan Jameson, Assistant Attorney General, concerning this request and she has graciously indicated that she would have no objection to this extension. She has verified her position by her signature below. (In compliance with *In Re: Extensions in Criminal 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

No Opposition to Extension Request.


Megan Harrigan Jameson
Assistant Attorney General

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SC SUPREME COURT

Appellate Case No. 2016-000415

CLINTON FOLKES, 216506,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

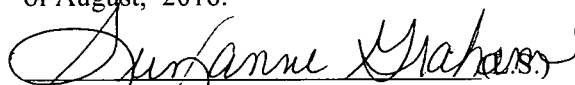
The undersigned attorney hereby certifies that a copy of the Petitioner's Motion for Extension of Time in the above-entitled case has been served upon opposing counsel this the 18th day of August, 2016, by mailing one (1) copy in a stamped envelope properly addressed to:

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 August, 2016.


Suzanne Graham, Notary Public for South Carolina

My Commission Expires: 2/28/24

LAW OFFICE OF



RECEIVED

AUG 22 2016

SC SUPREME COURT

TARA DAWN SHURLING, PA

Attorney and Counselor at Law

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August 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".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm

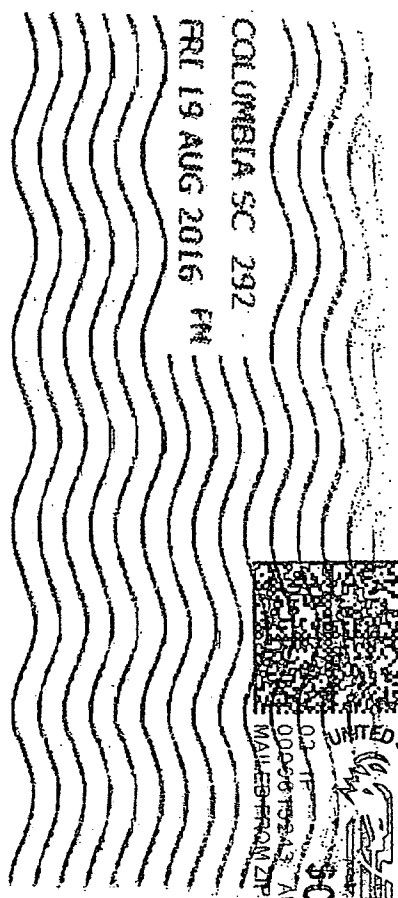
Enclosures

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



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FRI 19 AUG 2016 PM

Law Office of

TARA DAWN SHURLING, PA

3614 LANDMARK DRIVE, SUITE A
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The Honorable Daniel E. Shearouse
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P.O. Box 11330
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