

STATE OF SOUTH CAROLINA
In the Supreme Court

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

Case No. 2015-002511

RECEIVED

OCT 13 2016

S.C. SUPREME COURT

LEMONDE JAMES HOLLAND, 322379,

PETITIONER,

v.

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 Reply to Return Petition for Writ of Certiorari is due for filing on today's date. Because of the recent work outages due to hurricane Matthew, I have been unable to complete my Reply in this matter. Although I received Respondent's Return on September 19, 2016, I did not receive a missing page in that document until October 3, 2016. I had hoped to complete this Reply while we were closed, however, my power and internet service were out at my home part of the time and my internet service remains out at my home and office as of today's date. I have been able to determine that a Reply will be necessary. I now respectfully request a 10-day extension of time in which to prepare and submit my Reply to Return to Petition for Writ of Certiorari on behalf of this client.



Since this is my second extension request, my office contacted the Office of the Attorney General concerning this request. Respondent's counsel in this appeal, Jessica Kinard, was unavailable to give her position on this extension. Her supervising attorney, Johanna C. Valenzuela, Senior Assistant Deputy Attorney General, has consented to this request.

Respectfully submitted,



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

ATTORNEY FOR PETITIONER

This 10th day of October, 2016.

STATE OF SOUTH CAROLINA
In The Supreme Court

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

RECEIVED

OCT 13 2016

S.C. SUPREME COURT

Appellate Case No. 2015-002511

LEMONDE C. HOLLAND,

PETITIONER,

v.

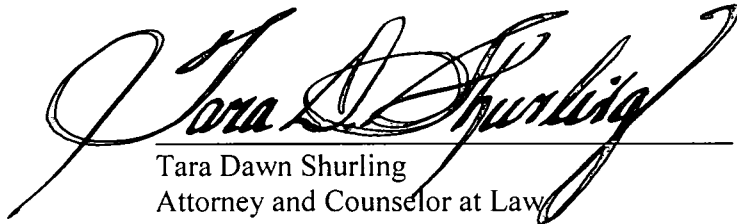
STATE OF SOUTH CAROLINA,

RESPONDENT.

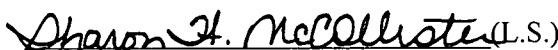
CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the Reply to the Return to the Petition for Writ of Certiorari in the above-entitled case has been served upon opposing counsel this the 10th day of October, 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


Tara Dawn Shurling
Attorney and Counselor at Law

SWORN TO BEFORE me this 10th day
of October, 2016.

 (L.S.)
Notary Public for South Carolina
My Commission Expires: Jan. 16, 2017

LAW OFFICE OF



RECEIVED

TARA DAWN SHURLING, PA

Attorney and Counselor at Law
3614 Landmark Drive
Suite A

Columbia, South Carolina 29204

OCT 13 2016

S.C. SUPREME COURT

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: tdslaw@shurlinglaw.com

October 10, 2016

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 original and two extra copies of the Petitioner's Motion for Extension of Time and Certificate of Service in the above-captioned case. I would appreciate your staff clocking and returning the extra copies in the envelope provided. Thank you for your assistance in this matter. I remain,

Sincerely yours,

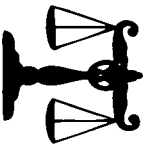
A handwritten signature in cursive script that reads "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

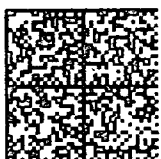
TDS/sm

Enclosures

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



UNITED STATES POSTAGE
PITNEY BOWES
\$000.885
02 1P
0000615243 OCT 10 2016
MAILED FROM ZIP CODE 29204

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

RE: Lemonde C. Holland