

STATE OF SOUTH CAROLINA  
In The Supreme Court

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APPEAL FROM PICKENS COUNTY  
Court of Common Pleas  
Edward W. Miller, Circuit Court Judge

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Appellate Case No. 2016-001819

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RECEIVED

JAN -9 2017

S.C. SUPREME COURT

WILLIAM DAVID WOOTEN,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

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

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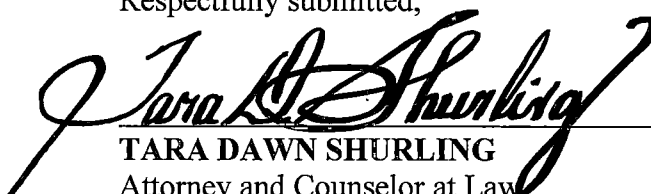
**THIS MATTER** comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for Writ of Certiorari is due for filing on today's date, January 9, 2017. Since my last extension request, I fell and broke my heel bone, and tore a ligament, in my left foot. Between the time I missed from work due to my foot, and the Christmas holidays, I was not able to complete this petition early. To make matters worse, I have been out of work several days since Christmas with a bad respiratory virus. For these reasons, 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, I attempted to have opposing counsel, Patrick Schmeckpeper, Assistant Attorney General, consent to this extension. Unfortunately, he is in court today and was unavailable. His supervisor, Joanna C. Valenzuela, Senior Assistant Deputy Attorney General, has consented to this request 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,

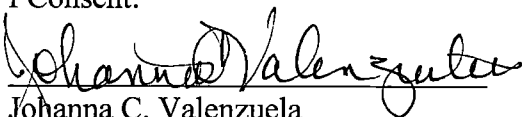


TARA DAWN SHURLING  
Attorney and Counselor at Law  
S. C. Bar No. 5099

ATTORNEY FOR PETITIONER.

This the 9<sup>th</sup> day of January, 2017.

I Consent:



Johanna C. Valenzuela  
Senior Assistant Deputy Attorney General  
on behalf of  
Patrick Schmeckpeper  
Assistant Attorney General

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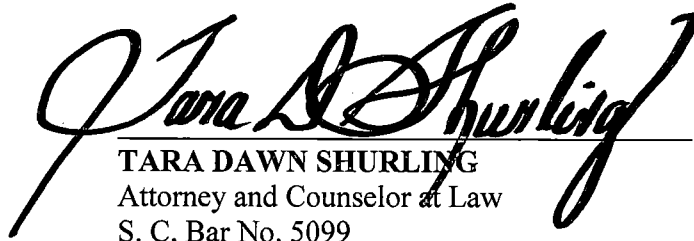
STATE OF SOUTH CAROLINA,

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 9<sup>th</sup> day of January, 2017, by mailing one (1) copy in a stamped envelope properly addressed to:

Patrick Schmeckpeper  
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

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 9<sup>th</sup> day  
of January, 2017.

  
Notary Public for South Carolina

My Commission Expires: 2/28/24