

2nd AFB due 2/7/18

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of General Sessions  
The Honorable Thomas Anthony Russo, Circuit Court Judge

**RECEIVED**

FEB 08 2018

SC Court of Appeals

Appellate Case No. 2017-001229

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

v.

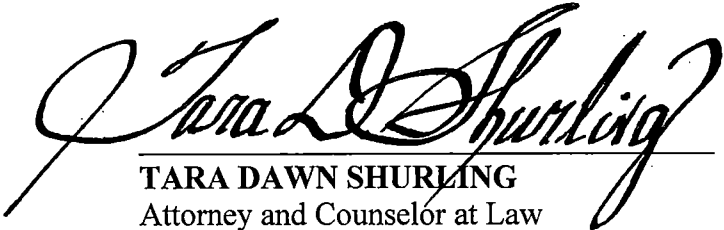
DAVID HAROLD CAMPBELL,

APPELLANT.

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

This case involves a direct appeal from Horry County. My Initial Brief and Designation of Matter are due for filing on today's date, February 7, 2018. I have not yet heard back from the Court Reporter concerning my request to review the audio backup tapes used to transcribe this trial record. My client has given me very specific information concerning a motion and a court ruling, which he believes was made on the record, and is not reflected in the trial transcript. I have written both trial lawyers in this case and requested their opinion concerning whether any language is missing from this transcript. Unfortunately, at the time I wrote them I had not accurately understood the client's position concerning what was missing. I have already heard back from one of the two lawyers, Russell B. Long, but the second lawyer, Morgan Martin, has not responded. I need to write them both again with a clearer description of what the client feels is missing from the trial transcript and will do so right away. I have written the Court Reporter again, and asked that she please advise me of the status of my request that the audio tapes from this trial be taken to Court Administration where I could review them and check the accuracy of the portion of the trial transcript disputed by the client. For the reasons given above, I respectfully request a 30-day extension of time in which to prepare and submit the Initial Brief and Designation of Matter on behalf of this client. Inasmuch as this is my second extension request, opposing counsel, J. Benjamin Alpin, Senior Assistant Deputy Attorney General, has been made aware of this request and has graciously consented.

Respectfully submitted,



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

ATTORNEY FOR APPELLANT.

This 7<sup>th</sup> day of February, 2018.

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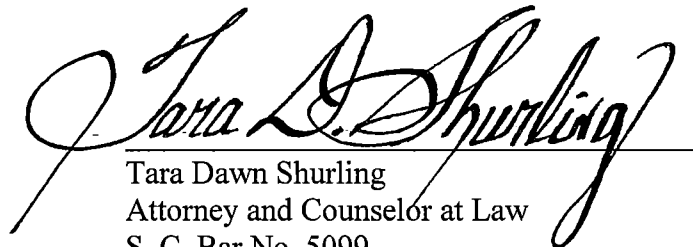
DAVID HAROLD CAMPBELL,

APPELLANT.

**CERTIFICATE OF SERVICE**

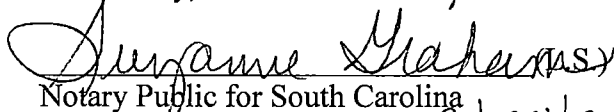
The undersigned attorney hereby certifies that a copy of the Motion for Extension of Time to File Initial Brief and Designation of the Matter in the above-entitled case has been served upon opposing counsel by depositing in the U.S. Mail, postage prepaid, this 7<sup>th</sup> day of February, 2018 addressed as follows:

J. Benjamin Alpin  
Senior Assistant Deputy 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 Appellant

SWORN TO BEFORE me this 7<sup>th</sup> day  
of February, 2018.

  
Notary Public for South Carolina

My Commission Expires: 2/28/24

LAW OFFICE OF



**TARA DAWN SHURLING, PA**

Attorney and Counselor at Law

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Suite A

Columbia, South Carolina 29204

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: [tdslaw@shurlinglaw.com](mailto:tdslaw@shurlinglaw.com)

February 7, 2018

The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

FEB 08 2018

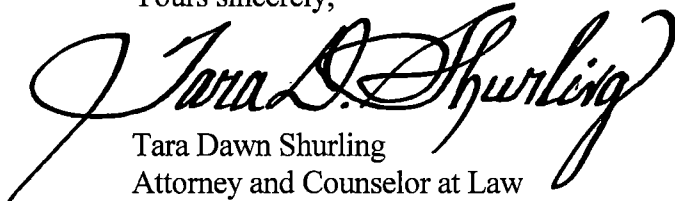
SC Court of Appeals

Re: State of South Carolina v. David Harold Campbell  
Appellate Case No.: 2017-001229

Dear Ms. Kitchings:

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 extra copy enclosed in the envelope provided. With my thanks for the Court's kind assistance in this matter, I remain,

Yours sincerely,

  
Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sg

Enclosures

cc: J. Benjamin Alpin, Senior Assistant Deputy Attorney General (w/enclosure)  
David Harold Campbell, #265686 (w/enclosure)  
Jynere Friday (w/enclosure)

✓