



May 21, 2018

Tara C. Sullivan  
Tara.Sullivan@kigates.com

**By Fax and Post**

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

**RECEIVED**  
MAY 23 2018  
SC Court of Appeals

**Re: The State v. James Heyward  
Appellate Case No. 2017-001542**

Dear Jenny:

I received the Motion to Appoint Counsel and proposed Order dated May 14, 2018, filed by the Division of Appellate Defense in the above-referenced matter late last week. This was my first notice of my potential appointment to this particular matter.

The proposed Order requests a deadline of June 13, 2018, for the Appellant's initial brief, and the Motion to Appoint Counsel indicates the brief must be delivered to the Division of Appellate Defense a week earlier on June 6th. This allows me only two and a half weeks to prepare a brief for what appears to have been an eight-day trial resulting in a conviction on eight different criminal charges, including murder and burglary, the transcript of which I have not yet been provided. I do not feel this is sufficient time to adequately prepare a brief on Appellant's behalf in this matter. In addition to the issue of my regular workload, my colleagues who would be assisting in this matter are out of the office much of the next few weeks and would be largely unavailable to assist in this laborious endeavor.

I would greatly appreciate it if the deadline for the initial brief would be set instead for August 13, 2018. Otherwise, I cannot accept this appointment at this time and would respectfully request that the Court deny the Motion to Appoint me as counsel in this matter.

Very truly yours,

A handwritten signature in cursive script that reads "Tara C. Sullivan".

Tara C. Sullivan

cc: Robert M. Dudek, Esquire  
Melody J. Brown, Esquire  
James Heyward, # 373035

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