

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

JUL 09 2019

SC Court of Appeals

Appellate Case No. 2017-001229

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

v.

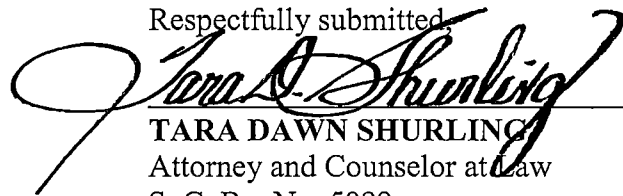
DAVID HAROLD CAMPBELL,

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 today; July 5, 2019. Due to ongoing medical issues, I have been unable to complete this brief for service and filing. For this reason, I respectfully request an additional 30-day extension of time in which to prepare and submit the Initial Brief and Designation of Matter on behalf of this client. I have not been able to discuss this extension specific request with opposing counsel, William Blich, Senior Assistant Deputy Attorney General, due to the holiday, however, in a previous conversation with Mr. Blich he indicated that he would not object to an additional extension should one become necessary due to the medical problems I have been having. I would ask that he confirm his position with the Court at his earliest convenience after the Fourth of July holiday. 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. (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).

Respectfully submitted,


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

ATTORNEY FOR APPELLANT.

July 5, 2019

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In The Court of Appeals

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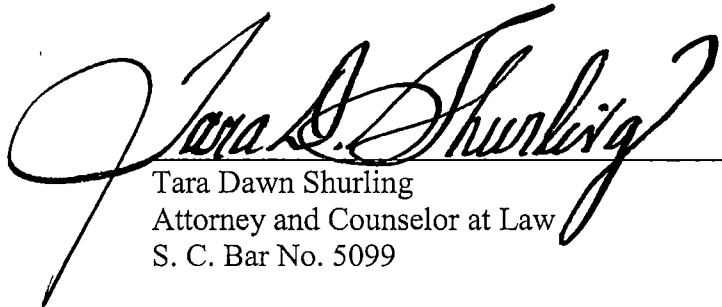
DAVID HAROLD CAMPBELL,

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 5th day of July, 2019 addressed as follows:

William Blich
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

LAW OFFICE OF



TARA DAWN SHURLING, PA

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

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(803) 738-8622

(Fax) (803) 738-1600

E-Mail: tdslaw@shurlinglaw.com

July 5, 2019

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

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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. I was not able to reach Mr. Blich today, however, in a previous conversation he indicated that he would not object to an additional extension should one become necessary due to my limited work schedule because of my ongoing medical issues with my hip. I regret having to ask for another extension in this matter, however, it was unavoidable. With my thanks for the Court's kind assistance in this matter, I remain,

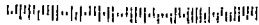
Yours sincerely,

A large, elegant handwritten signature in black ink that reads "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sg
Enclosures

cc: William Blich, Senior Assistant Deputy Attorney General (w/enclosure)



Law Offices of
TARA DAWN SHURLING
3814 Landmark Drive, Suite D
Columbia, South Carolina 29204

TO:

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

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