

APPEAL FROM HORRY COUNTY
Court of Common Pleas

RECEIVED

The Honorable J. Cordell Maddox Jr. Circuit Court Judge

NOV 14 2019

S.C. SUPREME COURT

Appellate Case No. 2019-000509

ROBERT ANTONIO STEED,

APPELLANT,

v.

THE STATE OF SOUTH CAROLINA,

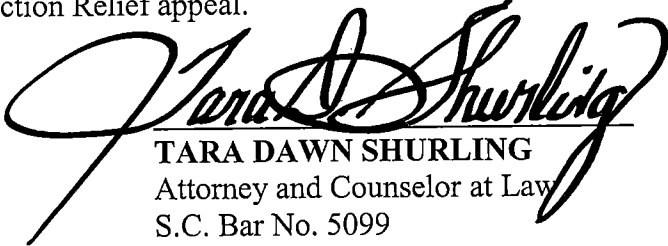
RESPONDENT

Extension Request
for
Petition for Writ of Certiorari and Appendix

NOW COMES the Petitioner in the above captioned Post-Conviction Relief Appeal, acting by and through his undersigned counsel, asking that the deadline for filing his Petition for Writ of Certiorari and Appendix in his PCR appeal be extended for an additional thirty (30) days. This is the fourth extension request Counsel has sought since the date she received the second of two PCR hearing transcripts necessary for this appeal on July 10, 2019. Counsel has been dealing with a painful injury to her right hip for well over a year. That condition became exacerbated in the last months leading up to her recent hip replacement surgery October 11, 2019. While the surgery was a complete success, Counsel's recovery has taken longer than she anticipated, due in part to the fact that when she returned to her office on October 28, 2019, she, and her paralegal, became ill with a stomach virus that caused her to be out of work for five more days. Counsel had still hoped to avoid asking for another extension, however, necessary documentation for this appeal had been sent to Counsel, by Petitioner's circuit court counsel,

using software that her firm does not have and has no previous experience with. When Counsel was finally able to return to work on November 7, 2019, she discovered that the Appendix had not been sent to the printer to be reproduced and bound because her staff had been unable to open the digital copies of these documents in the software used by PCR Counsel. Regrettably, in Counsel's absence they had not made necessary arrangements to either open the documents as provided, or, to obtain hard copies from another source. For these reasons, Counsel now seeks an additional thirty (30) day extension of time in which to file this Certiorari Petition and the appropriate Appendix to accompany that petition.

Petitioner was able to contact with opposing counsel, Benjamin H. Limbaugh, Assistant Attorney General, through his assistant and is advised that he has no objection to this request. Counsel no longer has an associate in her law firm, and therefore can not have another lawyer in her firm certify the necessity of the extension. Counsel does not anticipate any further extension requests for this stage of this Post-Conviction Relief appeal.



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

ATTORNEY FOR PETITIONER

TDS/ts

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of Petitioner's Fourth Extension Request for the filing of his Petition for Writ of Certiorari and Appendix in the above-entitled PCR appeal has been served upon opposing counsel this 12th day of November, 2019, by mailing one (1) copy in a stamped envelope properly addressed to:

Benjamin Hunter Limbaugh
Assistant Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, S.C. 29201



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

ATTORNEY FOR PETITIONER

TDS/ts