

From: [Tara Shurling](#)
To: [Court Of Appeals Filings](#); [Melody Brown](#); [Tara Shurling](#)
Subject: State v Charles E Mungin, III; App.Case No. 2019-001614
Date: Tuesday, September 15, 2020 4:43:12 PM

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

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Sep 15 2020

SC Court of Appeals

Re: State v Charles E Mungin, III;
App.Case No. 2019-001614

Dear Ms. Kitchings:

I have been substituted as counsel in this direct appeal. I ordered a digital copy of the transcripts of the pre-trial motion hearing, the Trial Record, and post-trial hearing.

Approximately thirty (30) days ago the last of these records were received by my office. Unfortunately, the new Administrative Assistant I had at the time, did not follow instructions and notify the Court of our receipt of these records. She also did not calendar the Initial Brief of Appellant as due thirty (30) days from my receipt of the last of these transcripts. I caught this mistake a couple weeks ago, and intended to advise the Court formally of these errors the following day.

The next day, September 1, 2020, I suddenly got very sick. My temperature peaked at 103.6 that week and I ended up on IV antibiotics for a serious bacterial infection. They allowed me to come home, but I was quarantined until I got the results of the COVID 19 test the hospital gave me. I am just tomorrow finishing up two different types of oral antibiotics as well. Thankfully, the Covid 19 test was negative, but I have been on bed rest for the last two weeks. During that time period, I did go to the office once to check my mail.

I have searched this file to try and find out the exact date the last of these transcripts arrived. It was not properly documented in the file and the administrative assistant in question is no longer with me. My best guess is that the transcript arrived thirty (30) days ago. This would have made the Initial Brief of Appellant due today.

As I am still home sick, I will not be able to complete this brief by today's date. For that reason, I am requesting a thirty (30) extension of time in which to file this brief. If I am able to ascertain with more certainty what exact date I received the last transcript, I will notify the Court and modify my request. Otherwise, I am asking that I be given an extension of thirty (30) days from today's date to file the Initial Brief of Appellant. This is my first extension request at this stage of this direct appeal. I will advise the Court if I prove unable to complete this brief by that date.

I very much appreciate the Court's understanding and assistance during this difficult time. I have notified opposing counsel of this request both by phone and by copy of this email. I remain,

Sincerely,

Tara Dawn Shurling
Attorney at Law
S.C. Bar No. 5099

Cc: Melody J. Brown
Assistant Deputy Attorney General

Sent from my iPhone