

State of South Carolina
In the South Carolina Court of Appeals

Appellate Case No. 2019-001614

RECEIVED

Dec 14 2020

SC Court of Appeals

The State,

Respondent,

v.

Charles Edward Mungin, III, Appellant,

Appellant.

**Petition for Extension
Initial Brief of Appellant**

The Initial Brief of Appellant in the above captioned direct appeal is due for service and filing on today's date. Regrettably, under signed counsel has been unable to complete this Initial Brief. Counsel is currently without any support staff. Both her paralegals have quit working for her firm since the onset of the COVID 19 pandemic. Because of the difficulty posed by trying to train a replacement during this pandemic, Counsel decided to refrain from hiring a new paralegal until the height of the pandemic had passed. It has proven virtually impossible for Counsel to do her job as appellate counsel and run her office without a support staff. Counsel has now reluctantly lined up a new hire for the first of the year inasmuch as it has now become apparent that the risks attendant this pandemic are not likely to abate anytime in the immediate future.

In addition to the problems with Counsel trying to do everything necessary to run her firm without a paralegal, in the last ten days she developed a bad sinus infection. After finishing a course of Levofloxacin, Counsel remains ill and starting today, I she has been put on Prednisone. Counsel historically has a problem with Fall allergies and Prednisone usually clears up the resulting sinus infections, so she hopes to be better soon.

Due to Counsel's lack of support staff and being ill, she now requests a fourth, thirty (30) extension of time in which to complete this Initial Brief of Appellant. Counsel was unable discuss this request with opposing counsel, Melody J. Brown, Senior Assistant Attorney General, before filing this Petition and would therefore ask that she advise this Honorable Court of her

Charles Edward Mungin, III, Appellant
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position on the request directly. Counsel has served Attorney Brown with a copy of this petition by mail on today's date. (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).

Counsel no longer has an associate in her law firm, and therefore, can not have another lawyer in her office certify the necessity of the extension requested. Counsel assures this Honorable Court, however, that she would not seek this extension were it not necessary. She will do her best not to require a further extension at this stage of this appeal.

Respectfully submitted

Tara D. Shurling

TARA DAWN SHURLING

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ATTORNEY FOR PETITIONER

This 14th day of December, 2020

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Certificate of Service

Undersigned counsel certifies that a true copy of her Petition for a Fourth Extension of Time in which to file the Initial Brief of Appellant has been served up opposing counsel, Melody J. Brown, Senior Assistant Attorney General, this 14th day of December, 2020, by e-mailing the same in the digital address set forth below.

Melody J. Brown
Senior Assistant Deputy Attorney General
mbrown@scag.gov

Tara D. Shurling

TARA DAWN SHURLING
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ATTORNEY FOR PETITIONER

This 14th day of December, 2020