

State of South Carolina  
In the South Carolina Court of Appeals

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Appellate Case No. 2019-001614

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**RECEIVED**  
**Apr 26 2021**  
**SC Court of Appeals**

The State,

Respondent,

v.

Charles Edward Mungin, III, Appellant,

Appellant.

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**Petition for Extension  
Initial Brief of Appellant**

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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. The Court has been very generous with me in granting a number of extensions for the Initial Brief of Appellant in this appeal and I am very grateful for that consideration. Between both my paralegals quitting during the pandemic, and recent technical problems with my computer network system, I have had a difficult time getting this brief completed, served and filed.

To be fully candid with the Court, I have been ill for nearly the last two months. I had a terrible reaction to my first COVID vaccine shot on March 1, 2021 and was out sick for 5 days then. I recovered and then on March 15<sup>th</sup> I woke with my arm very swollen and painful with large whelps on my upper arm. That secondary reaction cleared up by March 22<sup>nd</sup> and I got my second vaccination on March 29<sup>th</sup>. I was extremely reluctant to take the second shot, but did it anyway. By the third day after that shot, I had large knots in the palm of my left hand (shot arm) and a small pool of blood under the skin on the heel of my left hand. Several days later, my left arm began getting numb and my hand tingled constantly. Having had such a bad inflammatory reaction to the first shot, I felt the recent symptoms were likely just a similar reaction and decided to wait a few days and see if it would clear up. On April 13, 2021, I was not better and my internist sent me to an emergency room to make sure I was not experiencing a clotting response to the vaccine. On April 14, 2021, after three MRIs, two without contrast and one with

contrast, as well as an echocardiogram and lots of blood work, the ER ruled out clotting, but diagnosed me as having severe stenosis of the cervical spine at C-5-C6 and C6-C7. I was initially surprised by this diagnosis; however, it was not terribly shocking in light of chronic headaches I have been experiencing in the neck region and behind my eyes. The numbness on my left side has now spread to my left leg with persistent tingling in my left foot. I have also been experiencing muscle weakness and fatigue, both of which are consistent with pressure on the spinal cord caused by my degree of stenosis. I apologize for burdening the Court with so much detail, however, I have a horror of sounding like a hypochondriac and wanted to provide the Court adequate information. Coming off a year and a half with health issues related to my fall in an Aiken Courtroom and eventual hip replacement, this feels like terrible timing. I have a copy of my radiology report scanned and available should the Court wish to see it. The anti-inflammatory medication I have been taking has not sufficiently reduced the swelling enough to resolve the numbness and nerve issues. I am now being sent to a spinal surgeon to determine whether intermittent traction and steroid infusions might resolve the problems associated with the stenosis and help me avoid surgery. I am very sorry these health issues have caused me to need to ask for further consideration from the Court on this brief. My client and I are in constant contact and he realizes how close to finished with his Initial Brief I was nearly two months ago because we have discussed his case on a regular basis. I have advised him that I was going to need to ask for another thirty day extension and he is in agreement with that plan. I am quite hopeful that I will feel better quickly and will be able to get this done sooner than thirty days. On the other hand, I do not know how long the therapy planned will last or how much I will feel like working during the process. I will do my very best.

I no longer have an associate in my law firm, and therefore, can not have another lawyer in her office certify the necessity of the extension requested. I was not able to speak with opposing counsel earlier today and realize it is now after hours. I would ask that Melody J. Brown, Senior Assistant Deputy Attorney General, advise the Court directly concerning her position in this matter. I assure this Honorable Court, that I would not be seeking another extension if there had been any way to avoid it. I will do my best not to require a further extension at this stage of this appeal. I wish to thank the Court for its patience in this matter. I deeply regret having to ask for additional consideration at this time.

Respectfully submitted

s/ *Tara D. Shurling*

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ATTORNEY FOR PETITIONER

This 26th day of April, 2021

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**Certificate of Service**

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Undersigned counsel certifies that a true copy of her Petition for a seventh extension of Time in which to file the Initial Brief of Appellant has been served up opposing counsel, Melody J. Brown, Senior Assistant Deputy Attorney General, this 26th day of April, 2021, by e-mailing the same to the digital address set forth below.

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

s/ *Tara D. Shurling*  
**TARA DAWN SHURLING**  
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This 15<sup>th</sup> day of March, 2021