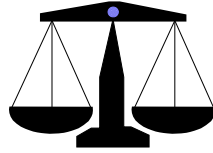


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**RECEIVED**

**May 24 2021**

**S.C. SUPREME COURT**

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May 24, 2021

The Honorable Daniel E. Shearouse  
Clerk, Supreme Court of South Carolina  
P.O. Box 11330  
Columbia, SC 29211

Re: State of South Carolina v. Julian C. Young; 2011-GS-38-1833.  
Appellate Case No. 2020-000896

Dear Mr. Shearouse:

My Petition for Writ of Certiorari in the cross-appeal filed by Respondent/Petitioner in the above captioned matter was due Friday, May 21, 2021. The Return to the State's Petition for Writ of Certiorari was due that same date. I was able to get the draft of the Return completed, but unfortunately when I started to convert my transcript references to Appendix cites, something went wrong with my computer and it would not let me make changes to any saved documents. I struggled with this problem until very late in the evening and finally gave up and e-filed my draft Return with the original cites to the records before the court to avoid missing the deadline altogether. There was extensive editing which needed to be done at that point, but I was never able to figure out the problem on my own. Because it was Friday evening, I was not able to get the professional assistance with this problem until today. I was not able to complete my Petition for Writ of Certiorari in the cross-appeal and noted my request for an extension in the email submitted with the filing on the draft Return to the State's Certiorari Petition. At that time I indicated I would file a more formal request the following day, but that did not prove possible as I was still unable to figure out what was wrong with my computer.

I deeply regret not being able to complete the Certiorari Petition on the cross-appeal by the deadline set by the most recent deadline set by the Court. As I believe I have already advised the Court, I have recently begun physical therapy for severe stenosis of the cervical spine, and moderate stenosis in sections of my lumbar spine. This condition was recently diagnosed when my left arm and leg went numb and I developed tingling in both that hand and foot. I had ignored painful headaches I have been having in my neck and shoulders for quite sometime now because I assumed, foolishly, that they were just stress headaches from too many hours at my computer. When I developed serious reactions following both COVID shots, on March 1<sup>st</sup> and March 29<sup>th</sup>, I honestly thought the numbness and tingling that

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followed were related to those reactions. The stenosis was discovered when I underwent testing to rule out blood clots as the cause of the numbness and tingling. As it turns out, the doctors involved with my care think it was purely coincidental that the two things happened so closely in time. Regrettably, this condition is limiting the number of hours I can spend at my computer without being in pain. I have begun physical therapy and will be meeting with a spinal surgeon to discuss non-surgical options soon. For now, I have no choice but to ask for the Court's continued patience with me as I work through this unexpected problem.

I was able to get the problem with my computer fixed earlier today. Therefore, I should be able to get the Return I filed Friday edited and fix the Appendix cites by the end of the day tomorrow. I now ask that I be permitted to file an Amended Return to Petitioner/Respondent's Certiorari Petition on tomorrow's date. Fortunately, it should not take me long to finish the Certiorari Petition for the cross-appeal in this matter. Given the limitations I am operating under at present with regard to my time at my keyboard, however, I would ask that the Court grant me one last extension until this coming Friday, May 28, 2021. I would gladly stay up as late as necessary to get this Return submitted tonight, but working until nearly midnight Friday night left me flat on my back all day Saturday and half of Sunday. I did get the opportunity to discuss this request with opposing counsel, Ben Limbaugh earlier today and he has kindly consented to both these requests. By my electronic signature below, I hereby certify that I have copied him on both my email to the Court and this request letter. Thank you very much for your kind assistance in this matter.

Sincerely,

*/ Tara D. Shurling*

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/ts

Cc: Benjamin H. Limbaugh, Assistant Attorney General