

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

Appeal from Orangeburg County  
Court of General Sessions

Edgar W. Dickson, Circuit Court Judge

---

Case No. 2011-GS-38-1833  
Appellate Case No. 2012-213006

---

STATE OF SOUTH CAROLINA,

RESPONDENT.

v.

JULIAN C. YOUNG,

APPELLANT.

---

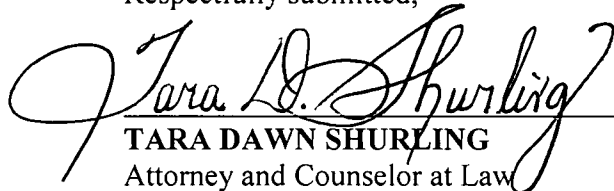
**APPELLANT'S MOTION  
FOR EXTENSION OF TIME**

---

This case involves a direct appeal from Orangeburg County. My Initial Brief and Designation of Matter are due for filing on May 1, 2013. My Initial Brief and Designation of Matter is due for filing on May 1, 2013. Because of my busy schedule, I will be unable to complete the preparation of this document by that date and respectfully request a 30-day extension of time in which to prepare and submit the Initial Brief and Designation of Matter on behalf of this client.

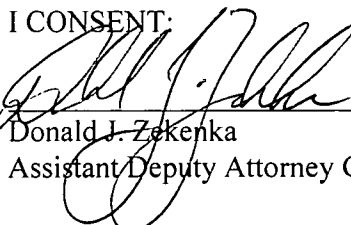
Since this is my third extension request, opposing counsel, Donald J. Zelenka, Assistant Deputy Attorney General has signed this motion. (In compliance with *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, S. C. Sup. Ct. Order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1). I no longer have an associate in my law firm, and therefore can not have another lawyer in my firm certify the necessity of the extension. My calendar is much clearer for the next three weeks. For that reason, I do not anticipate any further extension request for this stage of this appeal.

Respectfully submitted,

  
TARA DAWN SHURLING  
Attorney and Counselor at Law

ATTORNEY FOR APPELLANT.

I CONSENT:

  
Donald J. Zelenka  
Assistant Deputy Attorney General

RECEIVED

MAY 03 2013

SC Court of Appeals

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM ORANGEBURG COUNTY  
Court of General Sessions

Edgar W. Dickson, Circuit Court Judge

---

Case No. 2011-GS-38-1833  
Appellate Case No. 2012-213006

---

STATE OF SOUTH CAROLINA,

Respondent,

vs.

JULIAN C. YOUNG,

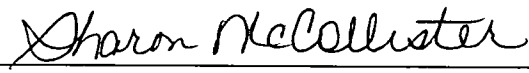
Appellant.

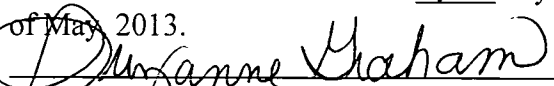
---

**CERTIFICATE OF SERVICE**

---

The undersigned hereby certifies that a copy of the Appellant's Motion for Extension of Time to File the Initial Brief and Designation of the Matter in the above-entitled case has been served upon opposing counsel, Donald J. Zelenka, Assistant Deputy Attorney General, Office of the Attorney General, P O Box 11549, Columbia, SC 29211, by depositing in the U.S. Mail, postage prepaid, this 1<sup>st</sup> day of May, 2013.

  
\_\_\_\_\_  
Sharon McCollister  
Paralegal to Tara Dawn Shurling

SWORN TO BEFORE me this 15<sup>th</sup> day  
of May, 2013.  
 (L.S.)  
Notary Public for South Carolina  
My Commission Expires: 2/28/23

**RECEIVED**  
MAY 03 2013  
**SC Court of Appeals**

LAW OFFICE OF



**TARA DAWN SHURLING, PA**

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: [tdslaw@shurlinglaw.com](mailto:tdslaw@shurlinglaw.com)

May 1, 2013

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

Re: State of South Carolina v. Julian C. Young; 2011-GS-38-1833.  
Case Tracking No.: 2012-213006

Dear Ms. Gee:

Enclosed please find for filing the original and six (6) copies of a Motion for Extension to File Initial Brief in the above captioned matter. The Initial Brief is due for filing on today's date. Opposing counsel, Donald J. Zelenka, Assistant Deputy Attorney General, has consented by his signature on the enclosed motion. I would appreciate your clocking and returning the two (2) extra copies enclosed in the envelope provided. With my thanks for the Court's kind assistance in this matter, I remain,

Yours sincerely,

A handwritten signature in cursive script that reads "Tara Dawn Shurling".

Tara Dawn Shurling  
Attorney and Counselor at Law

TDS/sm

Enclosures

cc: Donald J. Zelenka, Assistant Deputy Attorney General  
Julian Young, 352043  
Lee Smalls

**RECEIVED**

MAY 03 2013

**SC Court of Appeals**