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Apr 25 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
In The Supreme Court of South Carolina**

**APPEAL FROM CLARENDON COUNTY
Court of General Sessions
The Honorable D. Craig Brown, Circuit Court Judge**

**Appellate Case No. 2018-001493
Lower Court Case No. 16-GS-14-0161**

THE STATE OF SOUTH CAROLINA,

RESPONDENT,

v.

JUSTIN BRADLEY CAMERON,

PETITIONER.

**Petition to file
Petition for Writ of Certiorari
to the
South Carolina Court of Appeals
and
Appendix Out of Time**

The Petition for Rehearing in the above captioned matter was denied on February 24, 2022. Thereafter, undersigned Counsel first requested a twenty (20) day extension of time in which to file the Petition for Writ of Certiorari and Appendix in this matter. Thereafter, Counsel requested an additional ten (10) day extension of time in which to file a Petition for Writ of Certiorari on behalf of Petitioner. In that request Counsel acknowledged the fact that extensions in certiorari filings concerning decisions issued by the Court of Appeals are typically limited to twenty (20) days, but asked for additional consideration given the recent death of her father on March 22, 2022. Counsel has been under severe stress surrounding not only the death of her father, but the discovery that he was buried in a damaged vault without notice to Counsel or her mother. Counsel is an only child and her mother is in poor health. For this reason, it fell to Counsel to manage her father's care following his discharge from the hospital on December 30, 2021, following a pulmonary embolism he suffered on December 7, 2021.

Counsel is an only child. Since the discovery that her father was buried in a damaged vault, she has had to deal with the circumstances of his burial. It has now become necessary to have her father exhumed and the vault replaced. Counsel realizes that any death of an immediate family member is

difficult, but having to have her Father exhumed and his vault replaced, couple with her mother's health, has made her own grief all the more difficult and stressful. No doubt due to this stress, Counsel incorrectly requested the ten (10) day extension last sought rather than the twenty (20) day extension she actually needed. Counsel now realizes that she only asked for ten (10) days. She sincerely apologizes for this oversight and asks that she be allowed to file this Petition for Writ of Certiorari *out of time* on or before April 28, 2022, consistent with the amount of time she intended to request in her previous extension request. At that time, Counsel believed her father's exhumation and re-internment would be behind her by April 28, 2022. Unfortunately, it appears that it will not, however, Counsel will be able to get this Petition served and filed by that date and believes she can have the Appendix back from the printer by the 27th so that she can make the necessary changes to her petition to conform with the Appendix in time for filing both the petition and the Appendix on April 28, 2022. Counsel apologizes for this mistake, but hopes the Court will see fit to grant her this consideration in light of her extraordinary circumstances at the time of this request. Counsel has not had the opportunity to discuss this request with opposing counsel, Joshua A. Edwards, Assistant Attorney General, and asks that he convey his position on this request directly to the Court. Counsel has served the Honorable Jenny Abbott Kitchings, Clerk of Court for the South Carolina Court of Appeals with this request and asks that the Remittitur in this matter be stayed pending this Honorable Court's ruling on this request.

Respectfully submitted,

Tara D. Shurling

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

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ATTORNEY FOR PETITIONER

This 24th day of April, 2022.

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JUSTIN BRADLEY CAMERON,

APPELLANT.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that one copy of Petitioner's request to file her Petition for Writ of Certiorari and Appendix Out of Time in the above-entitled case has been served upon the Honorable Jenny A. Kitchings, Clerk of the S.C. Court of Appeals, this the 24th day of April, 2022, by sending a copy of her request to Ms. Kitchings at the email address listed below.

The Honorable Jenny A. Kitchings
Clerk of Court
The S.C. Court of Appeals
ctappfillings@sccourts.org

S/ Tara D. Shurling

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

ATTORNEY FOR APPELLANT

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that one copy of Petitioner's request to file her Petition for Writ of Certiorari and Appendix Out of Time in the above-entitled case has been served upon opposing counsel this the 24th day of April, 2022, by sending a copy of her request to **Joshua A. Edwards, Assistant Attorney General**, at the email address listed below.

Joshua A. Edwards
Assistant Attorney General
jedwards@scag.gov

S/ Tara D. Shurling

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

ATTORNEY FOR APPELLANT

April 24, 2022