

RECEIVED

Jan 10 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Horry County

Honorable William H. Seals, Circuit Court Judge
Appellate Case No. 2023-000285

In the Matter of the Care and Treatment of Joseph Curtis, Jr.

Appellant.

**MOTION FOR THIRD EXTENSION TO FILE INITIAL BRIEF OF
RESPONDENT AND DESIGNATION OF MATTER**

Respondent, State of South Carolina, hereby moves for an extension of time to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. Respondent submits the following:

1. The Initial Brief of Respondent and Designation of Matter are due to be filed and served January 10, 2024, pursuant to the second extension. Respondent requests a third extension to serve and file these documents, which is not made for the purpose of delay but due to a heavy workload and counsel having to assume responsibility for additional cases due to the death of a colleague and the recent departure of another attorney. Counsel has prioritized the additional caseload in conjunction with this case and other cases Counsel is working on.

2. Counsel has worked on the Initial Brief and Designation of Matter but has been unable to complete the Brief prior to the due date. Counsel assures the Court completion of the Brief is a high priority, and she will work diligently to complete it.

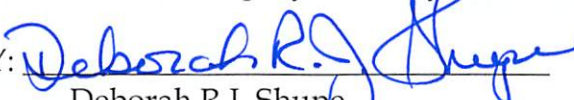
3. Please be advised that the State and Appellate Defense continue to consent to any requests up to and including January 31, 2024.

Based on the foregoing, counsel for Respondent respectfully requests that this Court grant a third 30-day extension in which to file and serve the Initial Brief of Respondent and Designation of Matter in this case, and that all deadlines be held in abeyance pending resolution of this Motion.

Respectfully submitted,

ALAN WILSON
Attorney General

DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General

BY: 
Deborah R.J. Shupe

DONALD J. ZELENKA
Deputy Attorney General

BY: 
Donald J. Zelenka

Office of the Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3970

January 10, 2024

RECEIVED

Jan 10 2024

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Horry County

Honorable William H. Seals, Circuit Court Judge
Appellate Case No. 2023

In the Matter of the Care and Treatment of Joseph Curtis, Jr.

Appellant.

PROOF OF SERVICE

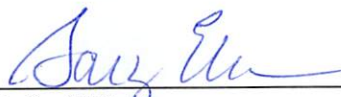
I, Sally Ellison, certify I served the Motion for Third Extension to File the Initial Brief of Respondent and Designation of Matter on Appellant by email to the address reflected in the AIS system.

David Alexander, Esquire (dalexander@sccid.sc.gov.)
Appellate Defender
South Carolina Commission on Indigent Defense
Division of Appellate Defense
PO Box 11589
Columbia, SC 29211-1589

The Motion for Third Extension to File the Initial Brief of Respondent and Designation of Matter has also been filed with the Court of Appeals at ctapp@sccourts.org.

I further certify that all parties required by Rule to be served have been served.

January 10, 2024.



Sally Ellison
Legal Assistant
Office of the Attorney General
Post Office Box 11549
Columbia, SC 29402
(803) 734-3835