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Apr 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 SIXTH EXTENSION TO FILE INITIAL BRIEF OF
RESPONDENT AND DESIGNATION OF MATTER**

Respondent, State of South Carolina, hereby moves for sixth 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 April 10, 2024, pursuant to the fifth extension. Respondent requests a sixth extension to serve and file these documents, which is not made for the purpose of delay but due to a heavy workload, extraordinary circumstances, and counsel having to assume responsibility for additional cases due to the death of a colleague and the recent departure of another attorney.

2. Counsel also has supervisory duties over a section in the Attorney General's office that have required substantial attention in the past several months. Counsel was unexpectedly out of the office due to illness from March 7 to March 18th. In addition, counsel was

required to be out of the office attending meetings and hearings in the South Carolina Senate. Last week, Counsel was out of the office due to her husband being admitted into the hospital. Currently, Counsel is out of the office due to a illness relapse.

3. 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.

4. Please be advised that the State and Appellate Defense continue to consent to any requests up to and including April 30, 2024.

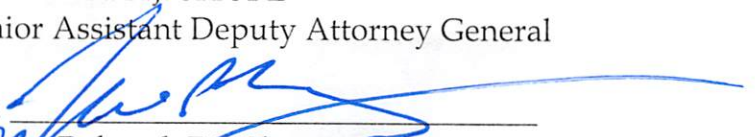

Based on the foregoing, counsel for Respondent respectfully requests that this Court grant a sixth 30-day extension in which to file and serve the Initial Brief of Respondent and Designation of Matter in this case, and that all deadlines be held in abeyance pending resolution of this Motion.

Respectfully submitted,

ALAN WILSON
Attorney General

DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General

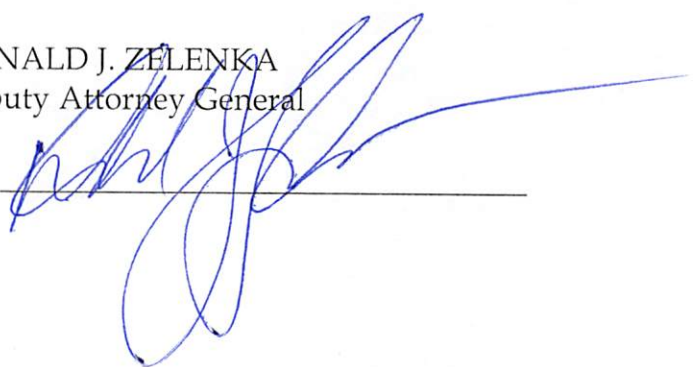
BY:


Deborah R.J. Shupe 

I have reviewed and approved this extension request.

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

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PROOF OF SERVICE


I, Grace Sommer, certify I served the Motion for Sixth 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 Sixth 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.

April 10, 2024.



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