

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

**May 13 2024**

**SC 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 SEVENTH AND FINAL EXTENSION TO FILE INITIAL BRIEF OF  
RESPONDENT AND DESIGNATION OF MATTER**

Respondent, State of South Carolina, hereby moves for seventh and final 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 May 13, 2024, pursuant to the sixth extension. Respondent requests a seventh extension to serve and file these documents, which is not made for the purpose of delay but due to a heavy workload.

2. In addition, Counsel was recently out of the office when her husband was in the hospital and was out of the office due to her own illness relapse.

3. Counsel has diligently 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 continue to work diligently to complete it.

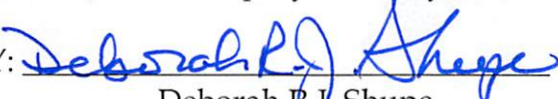
4. Please be advised that the State and Appellate Defense continue to consent to any requests up to and including May 30, 2024.

Based on the foregoing, counsel for Respondent respectfully requests that this Court grant a seventh and final 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.

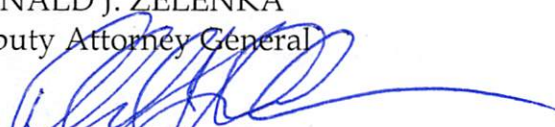
Respectfully submitted,

ALAN WILSON  
Attorney General

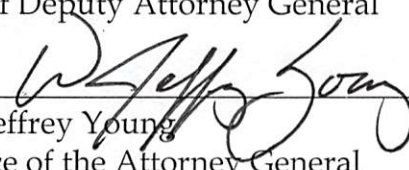
DEBORAH R.J. SHUPE  
Senior Assistant Deputy Attorney General

BY:   
Deborah R.J. Shupe

DONALD J. ZELENKA  
Deputy Attorney General

BY:   
Donald J. Zelenka

W. JEFFREY YOUNG  
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W. Jeffrey Young  
Office of the Attorney General  
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Columbia, SC 29211

May 13, 2024

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**PROOF OF SERVICE**

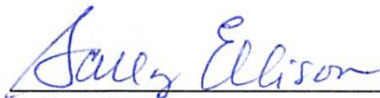
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I, Sally Ellison certify I served the Motion for Seventh and Final Extension to File the Initial Brief of Respondent and Designation of Matter on Appellant by email to the address reflected in the AIS system.

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 Seventh and Final 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.



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

May 13, 2024