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August 12, 2024

SENT VIA EMAIL

South Carolina Court of Appeals
Clerk of Court
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RECEIVED
Aug 12 2024
SC Court of Appeals

Re: Appellant Jevon Carter's Response to Respondent's Second Request for Extension of Time - Ex Parte: SCDMH (Jevon K. Carter) Appellate Case No. 2023-001766

Dear Clerk of Court,

This letter is in response to the Respondent's letter, dated August 12, 2024, wherein it has requested a second 30-day extension of time to file its Initial Brief and Designation of Matter. Mr. Carter would ask that the request be denied and, further, that no brief be permitted; it is out of time.

By the Court's letter dated, July 12, 2024, the Respondent's Brief was due, August 9, 2024. The Court's letter further indicated that no additional extensions of time would be granted without good cause shown. Respondent made its request for an extension after the time for filing the brief had expired and has offered no good cause. *See, e.g.*, S.C. R. Civ. P. 6(b) (stating that request "for extension of time should be made prior to expiration."). Generally, courts do not consider "workload" as good cause for missed deadlines.

Notwithstanding, undersigned is extremely sympathetic to workload issues and the risk of missed deadlines; attorneys navigate this peril every day. And, without exception, in my practice I have almost universally consented to extensions of time. We all would like grace in this regard.

But, this situation is unique. This appeal alleges that Mr. Carter has been illegally held since at least August 30, 2023, but truthfully much longer. We, in accord with the South Carolina Department of Mental Health Services, believe that every day longer he is held in its hospital is working both a constitutional violation and an active harm to Mr. Carter.

We would respectfully request that any request for additional time be denied and that the Court of Appeals consider the appeal on the Initial Brief of the Appellants alone.

Mr. Carter has been delayed for a very, very long time.

Please do not hesitate to contact me if there are any questions or concerns.

Regards,

A handwritten signature in blue ink, appearing to read 'D. Josev Brewer', with a long horizontal flourish extending to the right.

D. Josev Brewer
S.C. Bar No. 69680