

**RECEIVED**

**Feb 03 2025**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Kershaw County  
Honorable Daniel McLeod Coble  
Circuit Court Judge

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IN THE MATTER OF THE CARE AND TREATMENT  
OF JEREMIAH JAMES POUGH,

APPELLANT.

APPELLATE CASE NO. 2023-001950

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**MOTION FOR FOURTH EXTENSION OF TIME TO SERVE  
AND FILE THE INITIAL BRIEF OF RESPONDENT  
AND DESIGNATION OF MATTER**

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Respondent, State of South Carolina, hereby moves for a fourth 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 February 3, 2025, pursuant to a third extension. Respondent requests a fourth extension to serve and file these documents, which is not made for the purpose of delay, but due to a heavy workload.

2. Counsel has worked on the Initial Brief and Designation of Matter but has been unable to complete them prior to the due date due to an ongoing illness. Due to the inclement weather the Office of the Attorney General was closed and on a delayed schedule last week.

Counsel assures the Court completion of the Brief is a high priority, and she will work diligently to complete it.

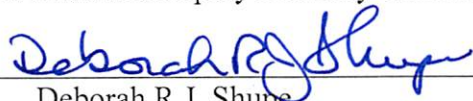
3. The undersigned consulted with counsel for the Appellant by email for his consent to the requested relief, and she is authorized to advise the Court that counsel consents to the requested relief.

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

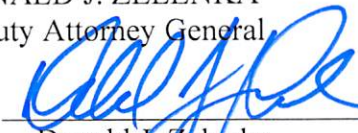
Respectfully submitted,

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

February 3, 2025

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IN THE COURT OF APPEALS

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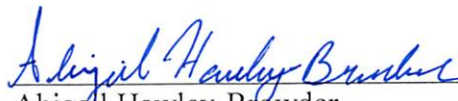
**PROOF OF SERVICE**

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I, Abigail Hawley-Browder, certify that I have served the Motion for Fourth Extension to File Initial Brief of Respondent and Designation of Matter on Appellant by sending an electronic copy via email to the address listed in AIS for the following individual:

Gary Johnson, Esquire  
S.C. Commission on Indigent Defense  
Division of Appellate Defense  
PO Box 11589  
Columbia, SC 29211

I further certify all parties required by Rule to be served have been served.  
This 3<sup>rd</sup> day of February, 2025.



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Abigail Hawley-Browder  
Legal Assistant  
Office of the Attorney General  
PO Box 11549  
Columbia, South Carolina 29211-1549