

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Honorable J.C. Nicholson, Jr., Circuit Court Judge
Appellate Case No. 2012-213405

The State,

Respondent,

v.

Raheem D. King,

Appellant.

**RESPONDENT'S MOTION FOR THIRD EXTENSION OF TIME WITHIN
WHICH TO SERVE AND FILE INITIAL BRIEF OF RESPONDENT
AND DESIGNATION OF MATTER**

Respondent hereby moves for a third extension of time to file the Initial Brief of Respondent and Designation of Matter to be included in the Record on Appeal. In support of this motion, Respondent submits the following:

1. The Brief of Respondent is due March 20, 2014, pursuant to a second extension. Respondent moves for a third extension, which is not made for the purpose of delay, but due to a heavy caseload.

2. In addition to her regular caseload, the undersigned supervises the Attorney General's Office's Sexually Violent Predator (SVP) Unit. In her capacity as supervisor of the SVP Unit, she is required on a daily basis to address multiple issues involving sexual predator cases, including legal issues in pending commitment and annual review cases, and she handles all sexual predator appeals.

3. In addition to the above, counsel worked on the Initial Brief and Designation in this matter, but was not able to complete it prior to the due date. The undersigned assures the Court completion of this brief is a high priority, and she will work diligently to complete it in a timely manner and without further extension requests.

4. The undersigned consulted with opposing counsel and is authorized to advise the Court that counsel consents to the requested relief.

Based on the foregoing, Respondent respectfully requests that this Court grant a third extension of thirty (30) days in which to file the Initial Brief of Respondent and Designation of Matter, and that all deadlines be held in abeyance pending resolution of this motion.

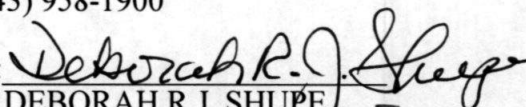
Respectfully submitted,

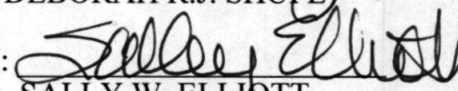
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By: 
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BY: 
SALLY W. ELLIOTT

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ATTORNEYS FOR RESPONDENT

Columbia, SC
March 20, 2014

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Lexington County
Honorable J.C. Nicholson, Jr., Circuit Court Judge
Appellate Case No. 2012-213405

The State,

Respondent,

v.

Raheem D. King,

Appellant.

PROOF OF SERVICE

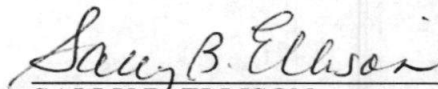
I, Sally B. Ellison, certify I served the Respondent's Motion for Third Extension on Appellant by depositing a copy in the United States mail, postage prepaid, addressed to:

Jenny L. Barwick, Esquire
650 E. Washington Street
Greenville, South Carolina 92601

Robert M. Dudek, Esquire
Appellate Defender
Post Office Box 11589
Columbia, South Carolina 29201

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

This 20th day of March, 2014.



SALLY B. ELLISON
Legal Assistant

Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-4156



ALAN WILSON
ATTORNEY GENERAL

March 20, 2014

Jenny L. Barwick, Esquire
650 E. Washington Street
Greenville, South Carolina 29601

Robert M. Dudek, Esquire
Appellate Defender
South Carolina Commission on Indigent Defense
PO Box 11589
Columbia, SC 29211-1589

Re: The State v. Rakeem D. King
Appellate Case No. 2012-213405

Dear Ms. Barwick and Mr. Dudek:

Enclosed herewith and served upon you is a copy of Respondent's Motion for Third Extension, with proof of service, in the above-referenced case.

Sincerely,

Deborah R.J. Shupe
Senior Assistant Deputy Attorney General

DRJS/sbe

Enclosures

cc: The Honorable Jenny A. Kitchings (original and 7 copies)

RECEIVED

MAR 20 2014

SC Court of Appeals