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SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Honorable Markley Dennis, Jr., Circuit Court Judge
Appellate Case No. 2013-002659

The State

Respondent,

v.

Keenan Coakley,

Appellant.

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

Respondent hereby moves for a second 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 November 14, 2014, pursuant to a first extension. Respondent moves for a second 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 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. 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.

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

Based on the foregoing, Respondent respectfully requests that this Court grant a second 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.

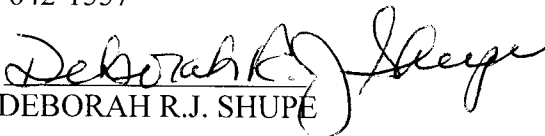
Respectfully submitted,

ALAN WILSON
Attorney General

DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General

SALLEY E. ELLIOTT
Senior Assistant Deputy Attorney General

J. STROM THURMOND, JR.
Solicitor, Second Circuit
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By: 
DEBORAH R.J. SHUPE

P.O. Box 11549
Columbia, SC 29211
(803) 734-3797
ATTORNEYS FOR RESPONDENT

Columbia, SC
November 14, 2014

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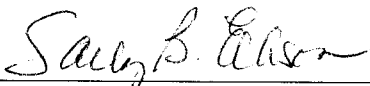
PROOF OF SERVICE

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

William L. Runyon, Esquire
#3 Gamecock Avenue, Suite 303
Charleston, South Carolina 29407

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

This 14th day of November, 2014



SALLY B. ELLISON
Legal Assistant

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



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ALAN WILSON
ATTORNEY GENERAL

November 14, 2014

William L. Runyon, Esquire
#3 Gamecock Avenue, Suite 303
Charleston, South Carolina 29407

Re: The State v. Keenan Coakley
Appellate Case No. 2013-002659

Dear Mr. Runyon:

Enclosed herewith and served upon you is a copy of the Respondent's Motion for Second Extension, with proof of service, in the above-referenced case. Thank you for consenting to this request.

Sincerely,

Deborah R.J. Shupe
Senior Assistant Deputy Attorney General

DRJS/sbe
Enclosure

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

Hand Delivery

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Please return extra copy to AG's Office