

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

DEC 15 2014

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

SC Court of Appeals

The State

Respondent,

v.

Keenan Coakley,

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 Initial Brief of Respondent and Designation of Matter are due December 15, 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 and computer network issues causing the deletion of a significant portion of the prepared brief.

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. Counsel worked on the Initial Brief and Designation in this matter, but as stated above, realized today a significant portion of the document was deleted by the computer

network. Unfortunately, there is no way to retrieve any previous versions, and therefore, counsel must re-create the deleted portion, which cannot be accomplished today. 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 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,

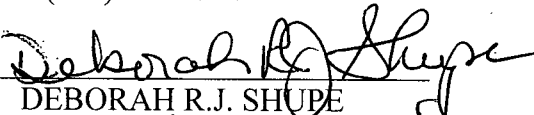
ALAN WILSON
Attorney General

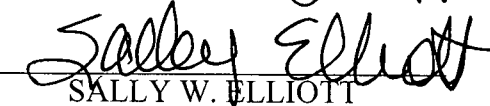
DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General

SCARLETT A. WILSON
Solicitor, Ninth Judicial Circuit

101 Meeting Street
Charleston, SC 29401
(843) 958-1900

By:


DEBORAH R.J. SHUPE


SALLY W. ELLIOTT

P.O. Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR RESPONDENT

Columbia, SC
December 15, 2014

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.

PROOF OF SERVICE

I, Ellen R. Dubois, 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:

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 15th day of December, 2014.



ELLEN R. DUBOIS

Legal Assistant

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

RECEIVED

DEC 15 2014

SC Court of Appeals



ALAN WILSON
ATTORNEY GENERAL

December 15, 2014

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

RECEIVED

DEC 15 2014

SC Court of Appeals

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 Third 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