

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Pickens County
Robin B. Stilwell, Circuit Court Judge
Appellate Case No. 2014-000015

RECEIVED
APR 24 2015
SC Court of Appeals

THE STATE,

RESPONDENT,

V.

CYNTHIA MANSELL GREENFIELD,

APPELLANT.

**MOTION FOR THIRD EXTENSION OF TIME TO FILE
AND SERVE RESPONDENT'S INITIAL BRIEF AND DESIGNATION
OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

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 to be filed and served on April 24, 2015, pursuant to two previous extensions granted by the Court. Due to an unusually heavy workload, counsel is unable to complete these documents on time. Therefore, Respondent requests a 30-day extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter.

2. This extension request is not intended for purposes of delay. Within the last 30 days, the undersigned prepared for, and argued three (3) cases, submitted multiple pleadings in pending appeals, and dealt with reconstruction of the record in a pending matter. In addition, she has been unavoidably out of the office in April due to illness. The undersigned also supervises

the Office of the Attorney General's Sexually Violent Predator (SVP) Unit. In her capacity as supervisor of the SVP Unit, she supervises two attorneys and a legal assistant, and is required on a daily basis to address multiple issues involving sexual predator cases, including legal issues in pending commitment and annual review cases. The undersigned assures the Court completion of the Brief is a high priority, and she will work diligently to complete it in a timely manner.

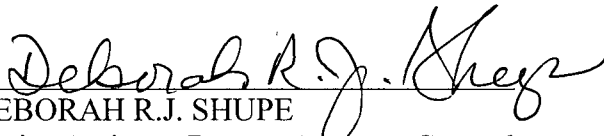
3. This appeal was filed in January 2014, and the trial transcript (738 pages) in July 2014. The appeal was designated as an Appellate Practice Project case in August 2014, and the current counsel was appointed in October 7, 2014, with an initial due date of December 8, 2014, (2 months) for serving and filing the Initial Brief and Designation. Therefore, counsel requested and received an extension of that deadline to January 7, 2015. The Attorney General's Office received the Initial Brief and Designation on January 8, 2015, and the appeal was assigned to the undersigned on January 12, 2015. In light of the circumstances set forth above, Appellant will not be unduly prejudiced if the Court grants this request.

4. The undersigned consulted with opposing counsel and advised him of this Motion.

WHEREFORE, for these reasons, Respondent respectfully requests 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; and for such other and further relief as the Court may deem just and proper.

Respectfully submitted,

ALAN WILSON
Attorney General

BY: 
DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General
SC Bar No. 5098

Post Office Box 11549
Columbia, SC 29211
(803) 734-3727

ATTORNEYS FOR THE RESPONDENT

April 24, 2015

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Pickens County
Robin B. Stilwell, Circuit Court Judge
Appellate Case No. 2014-000015

THE STATE,

RESPONDENT,

V.

CYNTHIA MANSELL GREENFIELD,

APPELLANT.

CERTIFICATE OF SERVICE

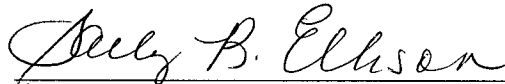
I, Sally B. Ellison, certify I served the Final Brief of Respondent on Appellant by depositing a copy in the United States mail, postage prepaid, addressed to:

Timothy L. Griffith, Esquire
360 West Wesmark Blvd.
Sumter, South Carolina 29154

Robert M. Dudek, Esquire
Chief Appellate Defender
SC Office of Appellate Defense
1205 Pendleton Street, Room 306
Columbia, South Carolina 29201

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

This 24th day of April, 2015



SALLY B. ELLISON

Legal Assistant

Office of Attorney General
Post Office Box 11549
Columbia, SC 29211
(803) 734-3727



RECEIVED
APR 24 2015
SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

April 24, 2015

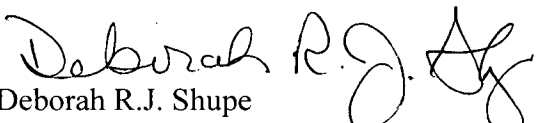
The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11529
Columbia, South Carolina 29211

Re: The State v. Cynthia Mansell Greenfield
Appellate Case No. 2014-000015

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of the Respondent's Motion for Third Extension, with Proof of Service. Please return the extra clocked copy via our courier.

Sincerely,


Deborah R.J. Shupe
Senior Assistant Deputy Attorney General

DRJS/sbe
Enclosures

cc: Timothy L. Griffith, Esquire
Robert J. Dudek, Esquire
Victim Services

Hand Delivery

S.C. COURT OF APPEALS

Please return extra copy to AG's Office