

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal From York County
The Honorable J. Mark Hayes, II, Circuit Court Judge
Appellate Case No. 2015-002122

IN THE MATTER OF THE CARE AND TREATMENT OF
KEITH FITZGERALD BURRIS,

Appellant.

**MOTION FOR THIRD EXTENSION TO SERVE AND
FILE INITIAL BRIEF OF RESPONDENT AND
DESIGNATION OF MATTER**

Respondent, State of South Carolina, through its undersigned counsel, would respectfully show unto this Court as follows:

1. The Initial Brief of Respondent and Designation of Matter is due to be served and filed October 17, 2016. The undersigned is under medically required work restriction due to a work related injury and can only work a few hours per day when possible. In addition, to her work related absences, counsel was also absent due to Hazardous Weather Leave on October 5-7, 2016 due to the recent hurricane which struck South Carolina during that time period.

2. The undersigned requests a third 30-day extension of time within which to serve and file the Initial Brief of Respondent and Designation of Matter in this appeal. This extension request is not intended for the purpose of delay. The undersigned has worked on the Initial Brief and Designation of Matter. She assures the Court completion of the brief is a high priority, and she will work diligently to complete it.

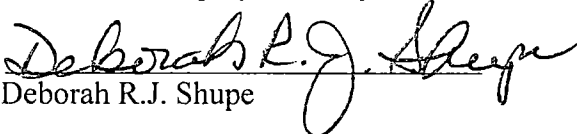
3. The undersigned consulted with counsel for the Appellant, and she is authorized to advise the Court that counsel for the Appellant consents to the requested relief.

Based on the foregoing, Respondent respectfully requests that this Court hold this matter in abeyance pending a resolution of this motion, and grant the Respondent's third request for a 30-day extension to file and serve the Initial Brief of Respondent and Designation of Matter in this appeal.

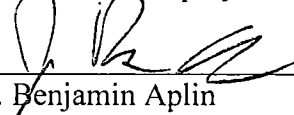
Respectfully submitted,

ALAN WILSON
Attorney General

DEBORAH R.J. SHUPE
Senior Assistant Deputy Attorney General

BY: 
Deborah R.J. Shupe

J. BENJAMIN APLIN
Senior Assistant Deputy Attorney General

BY: 
J. Benjamin Aplin

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(803) 734-3727

ATTORNEYS FOR RESPONDENT

October 17, 2016

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal From York County
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OCT 17 2016

SC Court of Appeals

IN THE MATTER OF THE CARE AND TREATMENT OF
KEITH FITZGERALD BURRIS,

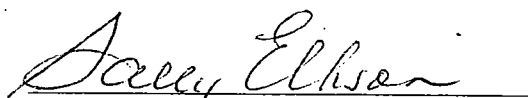
Appellant.

PROOF OF SERVICE

I, Sally Ellison, certify that I have served the Motion for Third Extension to File and Serve Initial Brief of Respondent and Designation of Matter on Appellant, by depositing a copy of same in the United States Mail, postage prepaid, addressed to:

Susan B. Hackett, Esquire
Appellate Defender
SCCID
Post Office Box 11589
Columbia, South Carolina 29211-1589

This 17th day of October, 2016


SALLY ELLISON
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(803) 734-3970



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SC Court of Appeals

ALAN WILSON
ATTORNEY GENERAL

October 17, 2016

HAND-DELIVERY

The Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

Re: In the Matter of the Care and Treatment of Keith Fitzgerald Burris
Appellate Case No. 2015-002122

Dear Ms. Kitchings:

Enclosed are an original and seven (7) copies of a Motion for Third Extension to Serve and File Initial Brief of Respondent and Designation of Matter, with Proof of Service, in the above-referenced appeal.

Sincerely,

Deborah R.J. Shupe
Senior Assistant Deputy Attorney General

DRJS/sbe
Enclosures

Cc: Susan B. Hackett, Esquire (w/enclosure)
Victim Services (w/enclosure)