

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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NOV 16 2016  
SC Court of Appeals

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

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

Appellant.

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

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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 November 16, 2016. The undersigned is under medically required work restriction due to a work related injury. The symptoms of the work related injury have been significantly more pronounced over the past two week, and as a result, the undersigned has only been able to work sporadically.

2. The undersigned requests a fourth 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 fourth request for a 30-day extension to file and serve the Initial Brief of Respondent and Designation of Matter in this appeal.

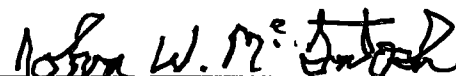
Respectfully submitted,

ALAN WILSON  
Attorney General

DEBORAH R.J. SHUPE  
Senior Assistant Deputy Attorney General

BY:   
for Deborah R.J. Shupe

JOHN W. MCINTOSH

By:   
John W. McIntosh  
Chief Deputy Attorney General

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

ATTORNEYS FOR RESPONDENT

November 16, 2016

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Appeal From York County  
The Honorable J. Mark Hayes, II, Circuit Court Judge  
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IN THE MATTER OF THE CARE AND TREATMENT OF  
KEITH FITZGERALD BURRIS,

Appellant.

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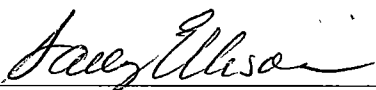
**PROOF OF SERVICE**

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I, Sally Ellison, certify that I have served the Motion for Fourth 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 16<sup>th</sup> day of November, 2016

  
\_\_\_\_\_  
SALLY ELLISON  
Office of the Attorney General  
Post Office Box 11549  
Columbia, South Carolina 29211  
(803) 734-3970



ALAN WILSON  
ATTORNEY GENERAL

November 16, 2016

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**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 Fourth 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)