

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

\_\_\_\_\_  
Appeal from Dorchester County  
The Honorable Diane Schafer Goodstein, Circuit Court Judge  
\_\_\_\_\_

**RECEIVED**

JUL 06 2017

**SC Court of Appeals**

IN THE MATTER OF THE CARE AND TREATMENT OF  
FRANK SAUNDERS,

APPELLANT.

\_\_\_\_\_  
**MOTION TO FILE INITIAL BRIEF OF RESPONDENT AND  
DESIGNATION OF MATTER OUT OF TIME AND FOR A  
30-DAY EXTENSION**  
\_\_\_\_\_

Respondent, State of South Carolina, through its undersigned counsel, hereby moves to file the Initial Brief of Respondent and Designation of Matter out of time and for a 30-day extension to file these documents 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 was due to be filed and served July 3, 2017. However, due to an administrative error, the date to file these documents was inadvertently mis-calendared for another date.

2. Therefore, Respondent requests an additional 30 days to file these documents. Counsel 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.

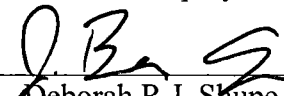
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Based on the foregoing, Respondent respectfully requests this Court hold this matter in abeyance pending resolution of this Motion, and grant Respondent's request for a 30-day extension of time to file and serve the Initial Brief of Respondent and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

Respectfully submitted,

ALAN WILSON

DEBORAH R.J. SHUPE  
Senior Assistant Deputy Attorney General

BY:   
for Deborah R.J. Shupe

Office of the Attorney General  
PO Box 11549  
Columbia, SC 29211  
803-734-3739

June 6, 2017

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Dorchester County  
The Honorable Diane Schafer Goodstein, Circuit Court Judge  
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SC Court of Appeals

IN THE MATTER OF THE CARE AND TREATMENT OF  
FRANK SAUNDERS,

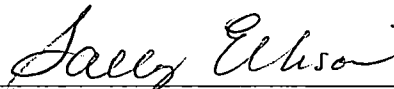
APPELLANT.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I, Sally Ellison, certify that I have served the Motion to File Initial Brief of Respondent Out of Time and For a 30-Day Extension, by depositing a copy of same in the United States Mail, postage prepaid, addressed to:

David Alexander, Esquire  
Appellate Defender  
SC Commission on Indigent Defense  
PO Box 11589  
Columbia, SC 29211-1589

I further certify that all parties required by Rule to be served have been served, this 6th<sup>h</sup> day of July, 2017.



\_\_\_\_\_  
Sally Ellison, Legal Assistant  
Office of the Attorney General  
PO Box 11549  
Columbia, SC 29211  
803-734-3970



ALAN WILSON  
ATTORNEY GENERAL

July 6, 2017

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JUL 06 2017

SC Court of Appeals

**HAND-DELIVERY**


The Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
PO Box 11629  
Columbia, South Carolina 29211

Re: In the Matter of the Care and Treatment of Frank Saunders  
Appellate Case No. 2016-002005

Dear Ms. Kitchings:

Enclosed are an original and seven (7) copies of a Motion to File Initial Brief of Respondent and Designation of Matter Out of Time and For a 30-Day Extension to file these documents.

Sincerely,

  
for Deborah R.J. Shupe

Senior Assistant Deputy Attorney General

DRJS/sbe  
Enclosures

cc: David Alexander, Esquire  
Victim Services