

THE STATE OF SOUTH CAROLINA

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IN THE COURT OF APPEALS

MAY 08 2019

APPEAL FROM DARLINGTON COUNTY

SC Court of Appeals

Roger E. Henderson, Circuit Judge

Case No. 2015CP1600788

Appellate Case No. 2018-001442

In the Matter of the Care and Treatment of
Larry James Tyler

Appellant.

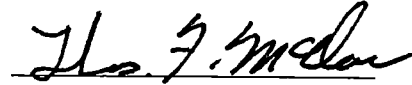
SECOND MOTION FOR EXTENSION OF TIME

I move for an extension of time until June 5, 2019, to file the Initial Brief of Appellant and Designation of Matter to Be Included in the Record on Appeal. This is the second request for an extension. The brief is due today under the Order dated April 9, 2019, which also provided there would be no further extension absent extraordinary circumstances. These are the extraordinary circumstances:

- One of the two full time paralegals has been out with a chronic illness for April and May, which is continuing.
- I have worked extensively on two other appeals, Appellate Case Nos. 2018-002149 and 2019-000201, since April 5, 2019.
- This is a *pro bono* appeal, which is much more difficult than I anticipated. In more than 100 appeals over 50 years, I cannot recall a more difficult brief.
- I have prepared a draft of the Designation of Matter to Be Included in the Record on Appeal and assembled the documents into a single PDF. I have begun work on the Initial Brief of Appellant. I have recorded 12.75 hours working on this, exclusive of legal research at home after hours on such issues as Penile Plethysmograph testing, due process, rights against self-incrimination, contempt of court, and other issues.
- I reasonably anticipate completing this work by June 4, 2019, subject to some reservations.

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Robert M. Dudek



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May 6, 2019

Other counsel of record are:

Alan McCrory Wilson
Deborah R. J. Shupe

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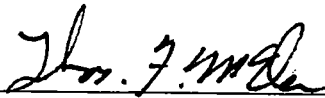
Appellant.

CERTIFICATE OF SERVICE

I certify that I have served the motion for extension of time on the respondent by depositing copies of it in the United States Mail, postage prepaid, on May 6, 2019, addressed to respondent's attorney of record:

Alan McCrory Wilson
Office of the S.C. Attorney General
Post Office Box 11549
Columbia, SC 29211-1549.

Deborah R. J. Shupe
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