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June 26, 2019

S.C. SUPREME COURT

The Honorable Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

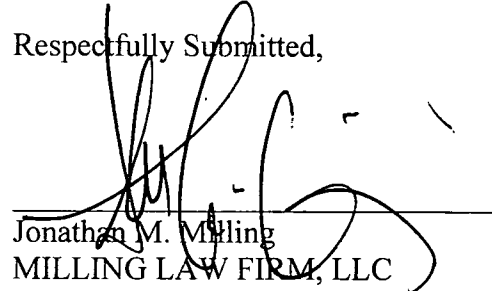
RE: John Doe v. Mark Keel, Chief, State Law Enforcement Division,
and the State of South Carolina
Appeal No. 19-000691, Civil Action No. 2017-CP-32-00712

Dear Clerk Shearouse,

The above referenced matter is one challenging the Constitutionality of the South Carolina Sex Offender Registration Act, South Carolina Code Annotated Section 23-3-400 et seq. The transcript requested for use in this proceeding was emailed on Sunday, June 2, 2019, and received on Monday, June 3, 2019. As such, according to Rule 208 of the South Carolina Rules of Appellate Procedure, the initial brief and designation of the record would be due on or before July 3, 2019. The undersigned learned today of two matters decided within the past week by the United States Supreme Court that may have some applicability to the instant matter, *Gundy v. United States*, 17-6086 (June 20, 2019) and *United States v. Haymond*, 17-1672 (June 26, 2019). Based upon the nature of these two cases, the potential impact upon the instant proceeding, and the current due date for the initial brief in this matter, the undersigned would respectfully request an extension of

thirty (30) days with which to review and digest the two aforementioned cases and address them in the initial brief, as may be appropriate. Prior to the filing of this motion, the undersigned has consulted with opposing counsel and secured their consent to the requested extension. If granted, the new deadline for the initial brief would be August 2, 2019.

Respectfully Submitted,



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ATTORNEY FOR PETITIONER

Cc: Adam L. Whitsett, Esquire