

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

Appeal from Marion County  
Honorable D. Craig Brown, Circuit Court Judge

IN THE MATTER OF THE CARE AND TREATMENT OF  
JIMMY MAC McBRIDE,

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Appellant. **SC Court of Appeals**

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RESPONDENT'S MOTION FOR SECOND EXTENSION

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Respondent hereby moves for a second extension of time to file the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal. In support of this motion, Respondent submits the following:

1. The Brief of Respondent is due February 19, 2013, pursuant to a first extension. Respondent moves for a second extension, which is not made for the purposes of delay, but due to a heavy caseload, as well as time out of the office due to illness.
2. During the month of January, the undersigned was unavoidably out of the office a significant period of time due to illness. Since her return to the office, counsel has made every effort to prepare pleadings as they became due, but has not been able to complete the Initial Brief of Respondent and Designation of Matter in this case.
3. In addition to her regular case load, the undersigned supervises the Attorney General's Office's Sexually Violent Predator (SVP) Unit and the Internet Crimes Against Children (ICAC) Task Force grant. In her capacity as supervisor of the SVP Unit, she is required on a daily basis to address multiple issues involving sexual predator cases, including legal issues in pending

commitment and annual review cases, and she handles all sexual predator appeals. In connection with the ICAC grant, the undersign assists in preparation of grant proposals and budgets, attends meetings of national and state ICAC personnel, and supervises an ICAC grant program manager, an investigator, a forensic examiner, and an Internet Safety Education Coordinator.

4. The undersigned assures the Court completion of this brief is a high priority, and she will work diligently to complete it in a timely manner and without further extension requests.

5. The undersigned consulted with opposing counsel and is authorized to advise the Court that counsel does not oppose the requested relief.

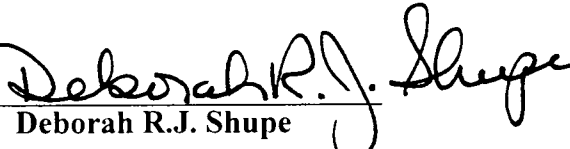
Based on the foregoing, Respondent respectfully requests that this Court grant a second extension of thirty (30) days in which to file the Initial Brief of Respondent and Designation of Matter, and that all deadlines be held in abeyance pending resolution of this motion.

Respectfully submitted,

ALAN WILSON  
Attorney General

DEBORAH R.J. SHUPE  
Senior Assistant Deputy Attorney General

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By:   
Deborah R.J. Shupe

ATTORNEYS FOR RESPONDENT

Columbia, South Carolina

February 19, 2013

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Marion County  
Honorable D. Craig Brown, Circuit Court Judge  
Appellate Case No. 2012-210127

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IN THE MATTER OF THE CARE AND TREATMENT OF  
JIMMY MAC McBRIDE,

Appellant.

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**PROOF OF SERVICE**

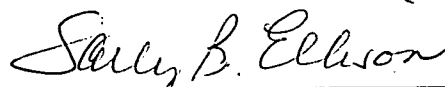
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I, Sally B. Ellison, certify I served the Respondent's Motion for Second Extension on Appellant by depositing a copy in the United States mail, postage prepaid, addressed to:

LaNelle Cantey DuRant  
Assistant Appellate Defender  
S.C. Commission on Indigent Defense  
Division of Appellate Defense  
Post Office Box 11589  
Columbia, SC 29211

I further certify that all parties required by Rule to be served have been served.

This 19<sup>th</sup> day of February, 2013.



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SALLY B. ELLISON  
Legal Assistant

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