

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

**RECEIVED**

APR 29 2013

Appeal from Charleston County  
Honorable Deadra L. Jefferson, Circuit Court Judge  
Appellate Case No. 2012-213697

**99 Court of Appeals**

IN THE MATTER OF THE CARE AND TREATMENT OF  
MICHAEL HARGROVE,

Appellant.

RESPONDENT'S MOTION FOR SECOND EXTENSION

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 April 29, 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.

2. 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 the month of April, counsel has filed returns and briefs in both appellate courts in SVP cases.

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. As part her ICAC responsibilities, counsel actively participated in planning the recent SC ICAC's "Stay Safe Online" Week (April 21-27, 2013), which included media events, Internet safety presentations, and a citizen town hall meeting for parents, students, teachers and administrators.

4. In addition to the above, counsel worked on the Initial Brief and Designation in this matter, but was not able to complete it prior to the due date. 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  
April 29, 2013

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

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Appeal from Charleston County  
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Appellate Case No. 2012-213697

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IN THE MATTER OF THE CARE AND TREATMENT OF  
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Appellant.

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**PROOF OF SERVICE**

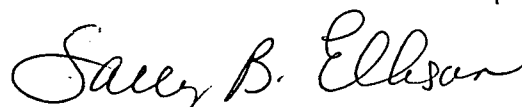
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I, Sally B. Ellison, certify I served the Respondent's Motion for Second Extension on Appellant by depositing a copy in the United States mail, postage prepaid, addressed to:

Rad S. Deaton, Esquire  
Deaton Law Firm  
2170 Ashley Phosphate Road, Suite 402  
North Charleston, SC 29406

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

This 29<sup>th</sup> day of April, 2013.



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SALLY B. ELLISON  
Legal Assistant

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