

FILED
JUL 15 2021
CLERK OF SUPREME COURT
OF WISCONSIN

STATE OF WISCONSIN
IN SUPREME COURT

Case No. 2018AP002205

In the interest of C.G., a person under the age of 18:
STATE OF WISCONSIN,

Petitioner-Respondent,

v.

C.G.,

Respondent-Appellant-Petitioner.

**MOTION TO EXTEND THE DEADLINE FOR
FILING THE RESPONDENT-APPELLANT-PETITIONER'S
REPLY BRIEF**

The respondent-appellant-petitioner, C.G., by her attorney, Assistant State Public Defender Cary Bloodworth, moves the court pursuant to Wis. Stat. Rule 809.82(2)(a) for the entry of an order extending the time within which she must file a reply brief by 15 days, to July 30, 2021. The grounds for this motion are as follows:

1. On April 27, 2021, this Court accepted review of this case. C.G. filed her opening brief on May 27, 2021, in accordance with the briefing schedule. On June 14, 2021, the state moved to extend the deadline to file its response brief by 30 days, or until

July 16, 2021. This Court granted that motion. The state filed its response brief on June 30, 2021. In accordance with the briefing schedule, C.G.'s reply brief is due on July 15, 2021.

2. Undersigned counsel's workload and schedule has precluded completion of the reply brief. Counsel is currently working on an opening brief in another case that is due to this Court on July 16, as well as numerous other postconviction motions. Additionally, counsel was out of the office on July 5 for the Fourth of July holiday, as well as July 7-14 on previously-scheduled leave.

3. Counsel requires additional time to complete the drafting and revision of the brief. Counsel believes that 15 additional days should be sufficient to complete the reply brief.

FOR THESE REASONS, C.G. respectfully requests that this Court enter an order extending the time for filing her reply brief by 15 days, until July 30, 2021.

Dated and filed this 15th day of July, 2021.

Respectfully submitted,



CARY BLOODWORTH 10/16/21
Assistant State Public Defender
State Bar No. 1089062

Office of the State Public Defender
Post Office Box 7862
Madison, WI 53707-7862
(608) 267-2123
bloodworthc@opd.wi.gov

Attorney for Respondent-Appellant-
Petitioner

cc: Attorney Scott E. Rosenow (*Via U.S. Mail*)
Assistant Attorney General
P.O. Box 7857
Madison, WI 53707-7857

C.G. (*Via U.S. Mail*)