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**S.C. SUPREME COURT**

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Administrative Law Judge

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Case No. 08-ALC-07-0425-CC

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Engaging and Guarding Laurens County's Environment ("EAGLE") ..... Petitioner,

vs.

South Carolina Department of Health and Environmental Control  
and MRR Highway 92, LLC, ..... Defendants,

of whom MRR Highway 92, LLC, is ..... Respondent.

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**MOTION FOR EXTENSION FOR  
FILING REPLY BRIEF OF PETITIONER**

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TO: ALL PARTIES AND THE SUPREME COURT:

PLEASE TAKE NOTICE that the Petitioner Engaging and Guarding Laurens County's Environment hereby moves the Supreme Court for an Order extending the time for filing its Reply Brief. Counsel for Petitioner received Respondent's Brief on July 11, 2013. The Reply Brief is due July 18, 2013, and the Petitioner seeks an extension of ten (10) days, until July 29, 2013.

The basis for this motion is that counsel for the Petitioner needs additional time to

conduct research and drafting in order to complete the reply brief in an appropriate manner. Counsel for Petitioner has been unable to dedicate time to work on the reply brief due to other demands, including a Petition for Certiorari which had to be filed by July 12, 2013, and a response to a motion to dismiss which is due on July 22, 2013. These filing deadlines have prevented counsel from spending the time necessary to adequately prepare a reply brief in this appeal.

Counsel for the Petitioner has consulted with the attorney for the Respondent MRR Highway 92, LLC, who does not consent to this motion.

WHEREFORE, the Petitioner Engaging and Guarding Laurens County's Environment requests that the Court of Appeals enter an order extending the time for filing its Reply Brief for ten (10) days until July 22, 2013.

Respectfully submitted,



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Amy E. Armstrong  
SOUTH CAROLINA ENVIRONMENTAL LAW  
PROJECT

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July 16 2013

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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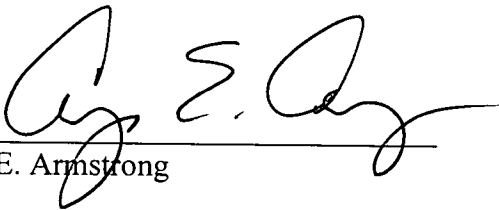
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**CERTIFICATE OF SERVICE**

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I hereby certify that on this date I served copies of the Motion for Extension for Filing Reply Brief upon counsel for the Respondents by placing same in the United States Mail, First Class Postage Prepaid, addressed to:

W. Thomas Lavender, Jr., Esquire  
Joan W. Hartley, Esquire  
Nexsen Pruet, LLC  
1230 Main Street, Suite 700  
Columbia, SC 29202

  
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Amy E. Armstrong

July 16, 2013