

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III  
Administrative Law Judge

---

Appellate Case No. 2023-001351

---

Blue Ridge Environmental Defense League,                      Appellant,

v.

South Carolina Department of Health and  
Environmental Control and Dominion Energy,                      Respondents.

---

APPELLANT’S MOTION FOR EXTENSION OF TIME TO FILE REPLY TO  
RESPONDENT’S RETURN TO THE PETITION FOR WRIT OF SUPERSEDEAS

---

Pursuant to Rule 240, SCACR, Appellant Blue Ridge Environmental Defense League, through its undersigned counsel, respectfully requests an additional five (5) day extension of time to file a Reply to Respondent’s Return to the Petition for Writ of Supersedeas. This is Appellant’s second request for extension and is necessitated due to (1) limitations, obligations, and time constraints posed by the Christmas and New Year holidays, (2) the breadth of Respondent’s Reply, which contains nearly 100 pages of dense permitting materials, many of which are single-spaced, and require the review of counsel, and (3) unavoidable deadlines that have arisen in other cases, including matters currently on appeal to this Court. A five (5) day extension of time will serve the interests of justice and aid the Court by allowing counsel

adequate time to prepare a thorough Reply. Appellant does not request this extension for the impermissible purpose of delay.

Appellant's Reply is currently due on Tuesday, January 2, 2024. If this extension is granted, Appellant's new deadline would be Monday, January 8, 2024. Appellant also respectfully requests that this Court hold all deadlines in abeyance until an order has been issued on this Motion.

Respectfully submitted,

STEPHEN A. SPITZ, ESQ.  
A BUSINESS LAW FIRM

s/Stephen A. Spitz  
Stephen A. Spitz (SC Bar No. 5287)  
164 Market Street, Suite 157  
Charleston, South Carolina 29401  
(843) 577-6531  
[stephenspitz994@gmail.com](mailto:stephenspitz994@gmail.com)

and

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez  
Jesse Sanchez (SC Bar No. 101906)  
751 Johnnie Dodds Boulevard, Suite 200  
Mount Pleasant, South Carolina 29464  
(843) 814-8181  
[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

**Attorneys for Appellant**  
**Blue Ridge Environmental Defense League**

Charleston, South Carolina  
January 2, 2023

STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III  
Administrative Law Judge

---

Appellate Case No. 2023-001351

---

Blue Ridge Environmental Defense League, Appellant,

v.

South Carolina Department of Health and  
Environmental Control and Dominion Energy, Respondents.

---

PROOF OF SERVICE

---

I, the undersigned, certify that I have served Appellant Blue Ridge Environmental Defense League's Motion for Extension of Time to File Reply to Respondent's Return to the Petition for Writ of Supersedeas via electronic mail on Counsel for Respondent Dominion Energy, Elizabeth B. Partlow, Esq. at her AIS-designated email address (beth@partlowlaw.com) and Brooks M. Smith, Esq. at his designated email address (brooks.smith@troutman.com), and Counsel for Respondent South Carolina Department of Health and Environmental Control, Bennet W. Smith, Esq. (smithbw@dhec.sc.gov), Christopher Patrick Whitehead, Esq. (whitehcp@dhec.sc.gov), and Sara Volk Martinez, Esq. (martinsv@dhec.sc.gov) at their respective AIS-designated email addresses on January 2, 2024.

[Signature on following page]

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)  
751 Johnnie Dodds Boulevard, Suite 200  
Mount Pleasant, South Carolina 29464  
(843) 814-8181  
[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

**Attorney for Appellant**  
**Blue Ridge Environmental Defense League**

Mount Pleasant, South Carolina  
January 2, 2024

January 2, 2024

VIA EMAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RE: Blue Ridge Environmental Defense League v. SCDHEC  
Appellate Case No. 2023-001351

Dear Ms. Kitchings:

Attached for filing, please find the follow:

1. Appellant Blue Ridge Environmental Defense League's Motion for Extension of Time to File Reply to Respondent's Return to the Petition for Writ of Supersedeas, and
2. Proof of Service.

A check for the fifty dollar (\$50.00) filing fee has been deposited in today's mail. Thank you for your assistance with this matter. Should you have any questions or wish to discuss the filing, please do not hesitate to contact me directly.

Sincerely,

s/Jesse Sanchez \_\_\_\_\_

Jesse Sanchez (SC Bar No. 101906)

Cc: Elizabeth B. Partlow, Esq. (Via email only)  
Brooks M. Smith, Esq. (Via email only)  
Bennet W. Smith, Esq. (Via email only)  
Christopher Patrick Whitehead, Esq. (Via email only)  
Sara Volk Martinez, Esq. (Via email only)  
Stephen A. Spitz, Esq. (Via email only)

**THE LAW OFFICE OF JESSE SANCHEZ, LLC**

751 Johnnie Dodds Blvd., Suite 200, Mount Pleasant, SC 29464 P: 843.814.8181 F: 843.284.3953  
jesse@jessesanchezlaw.com jessesanchezlaw.com



**RECEIVED**

**Jan 02 2024**

**SC Court of Appeals**