

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 INITIAL BRIEF AND DESIGNATION OF MATTER
TO INCLUDE IN THE RECORD ON APPEAL

Pursuant to Rule 240, SCACR, Appellant Blue Ridge Environmental Defense League, through its undersigned counsel, respectfully requests a thirty (30) day extension of time to file its Initial Brief and Designation of Matter to Include in the Record on Appeal. This is Appellant’s second Motion for Extension of Time as to its Initial Brief and Designation. The current deadline for filing the Initial Brief and Designation is Monday, June 17, 2024. If the Motion is granted, the new deadline will be Wednesday, July 17, 2024.

This extension is necessitated due the thirty-seven-page length of the underlying order and large record in this case, comprised of many technical documents, which require review and analysis by Appellate Counsel; the time necessitated in preparing the previously filed Petitions for Writ of Supersedeas, granted by this Court on May 13, 2024; and family obligations of the

undersigned. A thirty (30) day extension of time will serve the interests of justice and aid the Court by allowing counsel adequate time to prepare a thorough Initial Brief. Appellant does not request this extension for the impermissible purpose of delay.

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

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

Attorneys for Appellant
Blue Ridge Environmental Defense League

Charleston, South Carolina
June 12, 2024

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 Initial Brief and Designation of Matter to Include in the Record on Appeal 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 June 12, 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

Attorney for Appellant
Blue Ridge Environmental Defense League

Mount Pleasant, South Carolina
June 12, 2024

June 12, 2024

VIA U.S. MAIL AND EMAIL (ctappfilings@sccourts.org)

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



RECEIVED

Jun 12 2024

SC Court of Appeals

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 Initial Brief and Designation of Matter; 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