

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 fifteen (15) day extension of time to file its Initial Brief and Designation of Matter to Include in the Record on Appeal. The current deadline for filing the Initial Brief and Designation is Wednesday, July 17, 2024. If the Motion is granted, the new deadline will be Thursday, August 1, 2024.

This extension is necessitated due a filing deadline which has arisen in a matter before the South Carolina Supreme Court, currently due on July 18, 2024, and which has resulted in time constraints for counsel. A fifteen (15) 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
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and

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez
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Attorneys for Appellant
Blue Ridge Environmental Defense League

Charleston, South Carolina
July 15, 2024

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SC Court of Appeals

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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 July 15, 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
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Attorney for Appellant
Blue Ridge Environmental Defense League

Mount Pleasant, South Carolina
July 15, 2024

July 15, 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



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Jul 15 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)
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