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Aug 09 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

The Honorable Robert Lawrence Reibold
Beaufort County
Trial Court Case No. 2022ALJ070033CC

APPELLATE CASE NO. 2023-001592

William P. Scurry and J & W Corporation of Greenwood,

Appellants,

v.

South Carolina Department of Health and Environmental Control and Simmons Family
Holdings, LLC,

Respondents.

MOTION FOR EXTENSION

Pursuant to Rule 240, SCACR, Appellants request a thirty (30) day extension of the deadline for filing and serving the Record on Appeal in this case. The current deadline is August 12, 2024. The requested extended deadline would be September 11, 2024.

This is the second request for an extension of this deadline. The basis of the motion is that Counsel has lost substantial work time due to Hurricane Debby and further that certain Exhibits for the Record on Appeal are in Columbia at the Administrative Law Court and Counsel must arrange a time to review and copy same.

s/Thomas C. Taylor

Thomas C. Taylor, Esq.

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**ATTORNEY FOR APPELLANT
J & W CORPORATION OF GREENWOOD
AND WILLIAM P. SCURRY**

Bluffton, South Carolina
August 8, 2024

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v.

South Carolina Department of Health and Environmental Control and Simmons Family Holdings, LLC,

Respondents.

PROOF OF SERVICE

I hereby certify that this law firm represents the Appellants in the above-captioned matter and that on the date below, in Bluffton, South Carolina, a copy of the enclosed Appellants William P. Scurry and J & W Corporation of Greenwood's Motion For Extension to file Record on Appeal was served upon the following persons via electronic mail to their AIS e-mail addresses:

Documents Served:

**MOTION FOR EXTENSION TO FILE RECORD ON
APPEAL**

Parties Served:

Michael S. Traynham, Esq.
Maynard Nexsen
1230 Main Street, Suite 700
Columbia, SC 29201
MTraynham@maynardnexsen.com,
Counsel for Simmons Family Holdings, LLC

and

Bradley Churdar, Esq.
SC DHEC
1362 McMillan Ave., Suite 400
Charleston, SC 29405
churdabd@dhec.sc.gov
Counsel for the South Carolina Department of Health and Environmental Control

Additionally, I hereby certify that a copy of same was deposited in the United States Mail on this date, with sufficient First-Class postage pre-paid, addressed to Mr. Traynham, Esq., at 1230 Main Street, Suite 700, Columbia, SC 29201, and to Mr. Churdar, Esq., at 1362 McMillan Ave., Suite 400, Charleston, SC 29405.



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WILLIAM P. SCURRY AND J & W
CORPORATION OF GREENWOOD

Bluffton, South Carolina
August 8, 2024

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ADMITTED TO THE UNITED STATES
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,
COLORADO AND GEORGIA

CERTIFIED SC CIRCUIT
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Via First Class U.S. Mail and E-Mail Transmittal to: ctappfilings@sccourts.org

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

**Re: William P. Scurry And J & W Corporation Of Greenwood V. SCDHEC And
Simmons Family Holdings, LLC; Appellate Case No. 2023-001592**

Dear Ms. Kitchings:

I enclose herein for filing, a Motion For Extension of the time to serve and file the Record On Appeal. Due to loss of work ability during Hurricane Debby and the need to travel to Columbia to review the Exhibits, I cannot complete the Record On Appeal by August 12, 2024, when it is now due. This is the second extension request for the ROA, and I do not anticipate further extensions will be necessary barring unforeseen circumstances.

Enclosed with our mailed copy is a check in the amount of \$50.00 representing the filing fee for our motion for extension. Please let me know if you require any additional information. Thank you.

Cordially yours,
LAW OFFICE OF THOMAS C. TAYLOR, LLC


Thomas C. Taylor

TCT/dpt
Enclosure

cc: Mr. Wick Scurry, via email transmittal
Michael S. Traynham, Esq., via email transmittal
Bradley Churdar, Esq., via e-mail transmittal