



SC DEPARTMENT of  
**ENVIRONMENTAL  
SERVICES**

**Bradley D. Churdar, Esquire**  
**Office of General Counsel**  
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Charleston, South Carolina 29405

September 25, 2024

**RECEIVED**

**Sep 25 2024**

**SC Court of Appeals**

Via email to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings  
Clerk, 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  
Appellate Case No.: 2023-001592

Dear Ms. Kitchings:

Please allow this letter to serve as Joint Respondents' first motion requesting a thirty (30) day extension of time for filing the Joint Respondents' Final Brief in the above-referenced matter. All parties have consented to this extension. By my calculations, this would change the due date from September 30, 2024 to October 30, 2024.

Thank you very much for your consideration in this matter.

Sincerely,

*Bradley D. Churdar*

Bradley D. Churdar  
Associate General Counsel

BDC/jhd

cc: Thomas C. Taylor, Esquire (via email to [tom@thomastaylorlaw.com](mailto:tom@thomastaylorlaw.com))  
Michael S. Traynham, Esquire (via email to [mtraynham@maynardnexsen.com](mailto:mtraynham@maynardnexsen.com))