

**RECEIVED**

**Sep 30 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

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APPELLATE CASE NO. 2023-001592

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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.

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**APPELLANTS' MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANTS' FINAL BRIEF AND RECORD ON APPEAL**

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The Appellants, pursuant to Rule 240, SCACR, respectfully move this Court for a fifteen (15) day extension of the deadline for filing and serving their Final Brief and Record on Appeal in this case. This is the first requested extension. The requested extended deadline would be October 14, 2024. As the basis for this Motion, Counsel for Appellants advises the Court that Appellants' Brief and Record on Appeal, are currently located in a print shop in Biltmore, NC, that is inaccessible due to flooding, is closed indefinitely and is without

power. Counsel, a sole practitioner, was working on the case from our home in Asheville, NC, which was damaged by Hurricane Helene, and has also been without power, water, phone and Wi-Fi access, since early September 27, 2024. Counsel for Appellants cannot pickup and mail the Brief nor Record on Appeal at this moment.

I SO MOVE.

s/ Thomas C. Taylor

Thomas C. Taylor, Esq.

Law Office of Thomas C. Taylor, LLC

Post Office Box 1808, Bluffton, SC 29910

South Carolina Bar Number: 5499

Phone: 843-785-5050; Fax: 843-738-4502

Email: [tom@thomastaylorlaw.com](mailto:tom@thomastaylorlaw.com)

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

Bluffton, South Carolina  
September 30, 2024

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PROOF OF SERVICE

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I hereby certify that this law firm represents the Appellants in the above-captioned matter and that on the date below, in Charlotte, North Carolina, a copy of the Appellants' Motion For Extension Of Time To File Appellants' Final Brief and Record on Appeal, was served upon the following persons via electronic mail to their AIS e-mail addresses:

**Documents Served:**

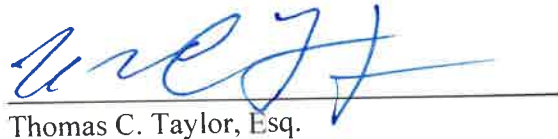
**APPELLANTS' MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANTS' FINAL BRIEF AND RECORD  
ON APPEAL**

**Parties Served:**

Michael S. Traynham, Esq.  
Maynard Nexsen  
1230 Main Street, Suite 700  
Columbia, SC 29201  
[MTraynham@maynardnexsen.com](mailto: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](mailto:churdabd@dhec.sc.gov)  
*Counsel for the South Carolina Department of Health and Environmental Control*



Thomas C. Taylor, Esq.  
Law Office of Thomas C. Taylor, LLC.  
Post Office Box 1808, Bluffton, SC 29910  
South Carolina Bar Number: 5499  
Phone: 843-785-5050; Fax: 843-738-4502  
Email: [tom@thomastaylorlaw.com](mailto:tom@thomastaylorlaw.com)

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

Bluffton, South Carolina  
September 30, 2024

LAW OFFICE OF  
**THOMAS C. TAYLOR, LLC**

ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,  
COLORADO AND GEORGIA

CERTIFIED SC CIRCUIT  
COURT MEDIATOR

10 PINCKNEY COLONY ROAD  
BUILDING 400  
BLUFFTON, SC 29909

TELEPHONE 843-785-5050  
TELECOPIER 843-738-4502

www.thomastaylorlaw.com • tom@thomastaylorlaw.com

MAILING ADDRESS  
P.O. BOX 1808  
BLUFFTON, SC  
29910-1808

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**SC Court of Appeals**

September 30, 2024

**Via U.S. Mail and E-Mail Transmittal to: ctappfilings@sccourts.org**

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

**Re: William P. Scurry And J & W Corporation Of Greenwood V. SCDHEC And  
Simmons Family Holdings, LLC; Appellate Case No. 2023-001592; Motion  
for Extension to File Appellants' Final Brief and Record On Appeal**

Dear Ms. Kitchings:

Please find attached a Motion for Extension Of Time to File Final Brief and Record on Appeal in this matter, both of which are due today. These documents are literally in a print shop in Biltmore, NC, which is inaccessible due to the flooding, without power or water, and closed. I was working on them from our Asheville, NC, home last week when the storm hit. I expect that I will be able to pick them up within a week, so I am respectfully asking for a fifteen (15) day extension. I am also attaching a Proof of Service, and a \$50 check is in the US Mail package also going out today. I do not have good telephone service yet, but believe that Respondents' Counsel will not object to his request.

Thank you for your and your staff's assistance and understanding.

Yours very truly,



Thomas C. Taylor

TCT/dpt  
Enclosures

cc: Bradley Churdar, Esq., via e-mail transmittal  
Michael Smoak Traynham, Esq., via e-mail transmittal  
Mr. William P. Scurry, via e-mail transmittal