

STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

The Honorable Ralph King Anderson, III  
Administrative Law Judge

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Appellate Case No. 2023-001351

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Blue Ridge Environmental Defense League, Appellant,

v.

South Carolina Department of Environmental  
Services and Dominion Energy, Respondents.

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PROOF OF SERVICE

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I, the undersigned, certify that on behalf of Appellant Blue Ridge Environmental Defense League, I have served the Final Brief of Appellant and the Final Reply Brief of Appellant via electronic mail on Counsel for Respondent Dominion Energy, Elizabeth B. Partlow, Esq., at her AIS-designated email address ([beth@partlowlaw.com](mailto:beth@partlowlaw.com)) and Brooks M. Smith, Esq., at his designated email address ([brooks.smith@troutman.com](mailto:brooks.smith@troutman.com)), and Counsel for Respondent South Carolina Department of Environmental Services, Bennet W. Smith, Esq. ([bennet.smith@des.sc.gov](mailto:bennet.smith@des.sc.gov)), Christopher Patrick Whitehead, Esq. ([christopher.whitehead@des.sc.gov](mailto:christopher.whitehead@des.sc.gov)), and Sara Volk Martinez, Esq. ([sara.martinez@des.sc.gov](mailto:sara.martinez@des.sc.gov)) at their respective AIS-designated email addresses on December 10, 2024. I further certify that I

served each of the above parties with the Record on Appeal (Vols. I-IV) on November 20, 2024, in the manner described above, having filed a Proof of Service with this Court on said date.

Respectfully submitted,

THE LAW OFFICE OF JESSE SANCHEZ, LLC

s/Jesse Sanchez

Jesse Sanchez (SC Bar No. 101906)

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**Attorney for Appellant**

**Blue Ridge Environmental Defense League**

December 10, 2024

Mount Pleasant, South Carolina



**From:** Jesse Sanchez jesse@jessesanchezlaw.com   
**Subject:** BREDL v. SCDES and Dominion Energy, Appellate Case 2023-001351  
**Date:** December 10, 2024 at 9:17 PM  
**To:** Beth Partlow beth@partlowlaw.com, Brooks M. Smith brooks.smith@troutman.com, Bennett W. Smith bennett.smith@des.sc.gov, Christopher P. Whitehead christopher.whitehead@des.sc.gov, Sara V. Martinez sara.martinez@des.sc.gov  
**Cc:** Steve Spitz stephenspitz994@gmail.com

Counsel,

Attached for service, please find (1) the Final Brief of Appellant, (2) the Final Reply Brief of Appellant, and (3) Cover Letter, all of which are being filed momentarily with the South Carolina Court of Appeals via OneDrive Electronic Submission along with the Record on Appeal (Vols. I-IV), which were previously served on November 20, 2024.

Thank you,

Jesse

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**PLEASE NOTE WE HAVE A NEW ADDRESS:**

Jesse Sanchez  
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**BREDL - Final Brief of Appellant  
.pdf**



**BREDL - Final Reply Brief of  
Appellant.pdf**  
245 KB



**BREDL - Cover Letter to Kitchings  
20241210.pdf**  
100 KB





December 10, 2024

VIA ONE DRIVE ELECTRONIC SUBMISSION  
AND UNITED STATES MAIL

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: Blue Ridge Environmental Defense League v. SCDES and Dominion  
Energy - Appellate Case No. 2023-001351

Dear Ms. Kitchings:

On behalf of Appellant Blue Ridge Environmental Defense League (BREDL),  
attached for filing with the Court, please find the following:

1. Final Brief of Appellant;
2. Final Reply Brief of Appellant;
3. Record on Appeal (Vols. I-IV); and
4. Proof of Service.

Bound copies of the above filings are being delivered via U.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)

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