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SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Chief Administrative Law Judge

ALC Docket No.: 24-ALJ-07-0266-CC and 24-ALJ-07-0267-CC
Appellate Case No.: 2025-000294

South Carolinians for Responsible Agricultural Practices, Appellant,

v.

South Carolina Department of Environmental Services and Jim Young d/b/a Young Broilers, Respondents.

AND

South Carolinians for Responsible Agricultural Practices, Appellant,

v.

South Carolina Department of Environmental Services and Heath Coggins Broilers, Respondents.

Amended Certificate of Service

I, Bennett W. Smith, attorney for the South Carolina Department of Environmental Services, hereby certify that I have on this 12th day of March, 2025, served the Department's March 10, 2025, *Motion for Substitution of Counsel* upon all parties via e-mail sent by the undersigned to the primary AIS e-mail address for counsel of record, as follows:

Emily S. Poole, Esquire Lauren Megill Milton, Esquire SC Environmental Law Project Post Office Box 1380 Pawleys Island, South Carolina 29585 Via Email: emily@scelp.org lauren@scelp.org Attorneys for Appellant	Michael S. Traynham, Esq. Joan W. Hartley, Esq. Maynard Nexsen 1230 Main Street, Suite 700 Columbia, South Carolina 29201 Via email: mtraynham@maynardnexsen.com jhartley@maynardnexsen.com Counsel for Respondents Young and Coggins
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s/ Bennett W. Smith
Bennett W. Smith
Assistant General Counsel
South Carolina Department of
Environmental Services
2600 Bull Street
Columbia, SC 29201
Tel: (803) 898-7286
bennett.smith@des.sc.gov

March 12, 2025
Columbia, South Carolina

From: [Bennett W. Smith](#)
To: MTraynham@maynardnexsen.com; [Joan W. Hartley](#); [Emily Poole](#); lauren@scelp.org
Cc: [Stephen P. Hightower](#); [Martinez, Sara](#); [Sandra R. Wessinger](#); [Makayla Gladden](#)
Subject: SCRAP v. SCDES - Appellate Case No. 2025-000294 - Motion for Substitution of Counsel
Date: Wednesday, March 12, 2025 12:50:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[SCDES - Motion for Substitution - 3.10.25.pdf](#)
[SCDES - Amended Certificate of Service - 3.12.25.pdf](#)

All:

Please find attached the Department's Motion for Substitution of Counsel, as previously sent to you in draft form for review and filed with the Court of Appeals on March 10, 2025.

Also attached is an Amended Certificate of Service reflecting service via email today. I will file this shortly in response to the Court's deficiency letter, with a cover letter and a copy of this email.

Thanks,

Bennett W. Smith
Assistant General Counsel
Office of General Counsel

Direct: 803.898.3570

OGC: 803.898.7284

Bennett.Smith@des.sc.gov

DES.SC.gov



SC DEPARTMENT of
ENVIRONMENTAL
SERVICES



March 12, 2025

Via Email: ctappfilings@sccourts.org

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

Re: SCRAP v. SCDES
Appellate Case No.: 2025-000294

Dear Madam Clerk:

Please find enclosed the Department's **Amended Certificate of Service**. This includes a copy of the email serving counsel of record with the Department's Motion for Substitution of Counsel filed with this Court on March 10, 2025.

This is in response to the Court's Deficiency Letter dated March 11, 2025, identifying a deficiency in the Department's proof of service for the above-referenced motion.

Thank you for your assistance with this matter. Please contact our office should you have questions or need additional information.

Sincerely,

s/ Bennett W. Smith

Bennett W. Smith

Assistant General Counsel

Enclosures

cc: Emily S. Poole, Esquire (via email: emily@scelp.org)
Lauren Megill Milton, Esquire (via email: lauren@scelp.org)
Michael S. Traynham, Esquire (via email: mtraynham@maynardnexsen.com)
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