



**SOUTH CAROLINA  
ENVIRONMENTAL  
LAW PROJECT**

*Lawyers for the Wild Side*

PO Box 1380, Pawleys Island, SC 29585 | (843) 527-0078 |  
www.scelp.org

*Executive Director & General Counsel*  
Amy E. Armstrong | amy@scelp.org

*Senior Manager of Strategy*  
Michael G. Corley | michael@scelp.org

*Senior Managing Attorneys*  
Benjamin D. Cunningham | ben@scelp.org  
Leslie S. Lenhardt | leslie@scelp.org

*Staff Attorneys*  
Lauren Megill Milton | lauren@scelp.org  
Emily S. Poole | emily@scelp.org  
Juan Tolley | juan@scelp.org  
Monica K. Whalen | monica@scelp.org

June 11, 2025

**VIA U.S. MAIL & ELECTRONIC MAIL**

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

**RECEIVED**

**Jun 11 2025**

**SC Court of Appeals**

**RE: *South Carolinians for Responsible Agricultural Practices v. South Carolina Department of Environmental Services, Jim Young, & d/b/a J. Young Broilers***  
**AND**  
***South Carolinians for Responsible Agricultural Practices v. South Carolina Department of Environmental Services and Heath Coggins Broilers***  
**Appellate Case No. 2025-000294**

Dear Ms. Kitchings:

Enclosed please find Appellant's Motion for an Extension of Time regarding its Initial Reply Brief. The filing fee of fifty dollars (\$50.00) for this request will follow. This is the first request for an extension of time to file the Initial Reply Brief.

Thank you for your kind consideration and assistance with this matter.

Respectfully,

Emily S. Poole

Enclosures

cc: Stephen P. Hightower, Esq.  
Bennett W. Smith, Esq.  
Michael S. Traynham, Esq.  
Joan W. Hartley, Esq.

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Chief Administrative Law Judge

Docket Nos. 24-ALJ-07-0266-CC, 24-ALJ-07-0267-CC  
Appellate Case No. 2025-000294

---

South Carolinians for Responsible Agricultural Practices, Appellant,

v.

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

AND

South Carolinians for Responsible Agricultural Practices, Appellant,

v.

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

---

**APPELLANT’S MOTION FOR AN EXTENSION OF TIME**

---

Pursuant to Rule 240, SCACR, Appellant South Carolinians for Responsible Agricultural Practices (“SCRAP”) hereby moves for an extension of time within which to file and serve Appellant’s Initial Reply Brief and any additional Designation of Matter to be included in the Record on Appeal (“Designation of Matter”). Appellant requests an extension of eight days to file its Initial Reply Brief and Designation of Matter, which are currently due June 12, 2025. An extension of eight days would bring this deadline to June 20, 2025.

Appellant received one extension of time to file its Initial Brief and Designation of Matter and has not received any other extension or any extension concerning its Initial Reply. The grounds for this motion are that one counsel for SCRAP is currently serving as primary caregiver to her mother with Alzheimer's and the other was out of office from June 2, the date that Respondents filed their initial brief, until June 9 for an important, immovable family gathering in the Lowcountry. Meanwhile, other impending professional matters and obligations have also created a need for additional time to prepare the Initial Reply Brief and any additional Designation of Matter. An eight day delay will not prejudice the rights of any of the parties. Counsel for the Appellant has conferred with Counsels for the Respondents, and there is no objection to this request for an extension. For these reasons, Appellant requests an extension of the deadline for filing and serving the Initial Reply Brief and any additional Designation of Matter to on or before June 20, 2025.

Respectfully submitted,

s/ Emily S. Poole

Emily S. Poole (SC Bar No. 106193)

Lauren Megill Milton (SC Bar No. 100389)

SOUTH CAROLINA ENVIRONMENTAL LAW PROJECT

P.O. Box 1380

Pawleys Island, SC 29585

(843) 527-0078

*Attorneys for the Appellant*

June 11, 2025  
Greenville, South Carolina

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**  
**Jun 11 2025**  
**SC Court of Appeals**

---

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Chief Administrative Law Judge

Docket Nos. 24-ALJ-07-0266-CC, 24-ALJ-07-0267-CC  
Appellate Case No. 2025-000294

---

South Carolinians for Responsible Agricultural Practices, Appellant,

v.

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

AND

South Carolinians for Responsible Agricultural Practices, Appellant,

v.

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

---

**PROOF OF SERVICE**

---

I hereby certify that on this date I served the foregoing Motion for an Extension of Time regarding Appellant's Initial Reply Brief and additional Designation of Matter upon counsel for the Respondents by AIS registered electronic mail and U.S. Mail with notification distributed to the following:

Stephen P. Hightower, Esq.  
Bennett W. Smith, Esq.  
Office of General Counsel  
South Carolina Department of Environmental Services  
2600 Bull Street  
Columbia, SC 29201  
Stephen.Hightower@des.sc.gov  
Bennett.Smith@des.sc.gov

Michael S. Traynham, Esq.  
Joan W. Hartley, Esq.  
Maynard Nexsen  
1230 Main Street, Suite 700  
Columbia, SC 29201  
MTraynham@maynardnexsen.com  
JHartley@maynardnexsen.com

s/ Emily S. Poole  
Emily S. Poole  
Lauren Megill Milton  
SOUTH CAROLINA ENVIRONMENTAL LAW PROJECT  
P.O. Box 1380  
Pawleys Island, SC 29585  
(843) 527-0078  
*Attorneys for the Appellant*

June 11, 2025  
Greenville, South Carolina