

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

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JUN 16 2025
SC Court of Appeals

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)
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Attorneys for the Appellant

June 11, 2025
Greenville, South Carolina

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT
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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:

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SC Court of Appeals

VIA U.S. MAIL & ELECTRONIC MAIL

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

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.



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SC Court of Appeals

ATTN: The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
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