



**SOUTH CAROLINA  
ENVIRONMENTAL  
LAW PROJECT**

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July 21, 2025

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JUL 24 2025

SC Court of Appeals

**VIA U.S. MAIL AND ELECTRONIC MAIL**

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

**RE: Appellant's Initial Reply Brief**  
***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 Madame Clerk:

Please find enclosed a corrected version of page 383, located in Volume II, of the record on appeal in the above-referenced matter for filing. The bound record on appeal, submitted under separate cover, contained an unsigned and unnotarized version of this page. The corrected version is enclosed here, and the electronic version of the record on appeal was updated before filing with the correct version of the document. By copy of this letter, I am serving counsel for all parties by regular mail and AIS registered electronic mail. 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.  
W. Thomas Lavender, Jr., Esq.

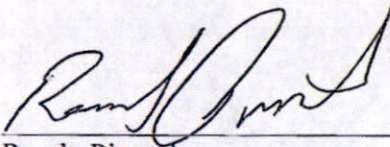
8. I received letters from the Department of Health and Environmental Control (DHEC), now known as the Department of Environmental Services (DES), announcing Coggins' and Young's intent to build agricultural animal facilities on the land adjacent to my property. I also received emails from the Department announcing the public meeting held in April and other updates. I submitted comments regarding the Coggins and Young proposed facilities.

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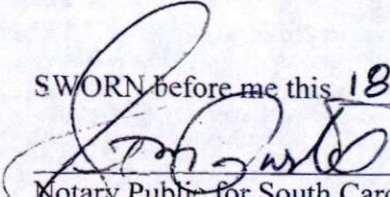
JUL 24 2025

SC Court of Appeals

Further the Affiant sayeth not.

  
\_\_\_\_\_  
Randy Piontek

SWORN before me this 18 day of November, 2024.

  
\_\_\_\_\_  
Notary Public for South Carolina

My Commission Expires: 2-16-2031



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