

**RECEIVED**

**Dec 17 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE CHARLESTON COUNTY CIRCUIT COURT

Frank R. Addy, Presiding Judge

---

Appellate Case No. 2025-001315

(Civil Action No. 2022-CP-10-05192)

---

South Carolina Coastal Conservation League  
and Charleston Waterkeeper, ..... Appellants,

v.

South Carolina Department of Health and Environmental Control ..... Respondent.

---

**MOTION FOR EXTENSION OF TIME  
TO FILE RESPONDENT’S INITIAL BRIEF AND  
DESIGNATION OF MATTER**

---

TO: THE COURT AND COUNSEL FOR ALL PARTIES

PLEASE TAKE NOTICE that, pursuant to Rule 240, SCACR, Respondent South Carolina Department of Health and Environmental Control, now known as South Carolina Department of Environmental Services (“SCDES” or “the Department”) respectfully requests a sixty-seven (67) day extension of time to file Respondent’s Initial Brief and Designation of Matter in this matter, making the Department’s deadline for filing its Brief and Designation of Matter March 2, 2026.

The basis for this motion is as follows:

Undersigned counsel acknowledges the requested extension is longer than a typical extension request. However, Respondent's counsel's trial schedule and workload is extraordinarily busy for the next couple of months. Last week, counsel represented the Department in a 2-day trial before the Administrative Law Court. Respondent's counsel has a 3-day trial January 14-16, 2026 and another 3-day trial February 23-25, 2026 and another trial on March 17, 2026. Discovery is still ongoing for the February and March trials. As such, Counsel will not have adequate time to prepare the Respondent's Initial Brief and Designation of Matter in this matter.

The counsel for Appellant has graciously consented to this extension request.

WHEREFORE, Respondent SCDES respectfully moves this Court for an Order extending the time for filing the Respondent's Initial Brief and Designation of Matter until March 2, 2026. The Department respectfully requests that all other deadlines be held in abeyance pending the Court's approval of this extension.

Respectfully submitted,

By: *Bradley D. Churdar*  
Bradley D. Churdar, S.C. Bar No. 12829  
South Carolina Department Environmental Services  
1362 McMillan Avenue, Suite 400  
Charleston, SC 29405  
(843) 953-0213  
[bradley.churdar@des.sc.gov](mailto:bradley.churdar@des.sc.gov)

Joseph A. Giordano  
South Carolina Department Environmental Services  
2600 Bull Street  
Columbia, SC 29201  
(843) 953-0213  
[joseph.giordano@des.sc.gov](mailto:joseph.giordano@des.sc.gov)  
*Attorneys for Respondent SCDES*

December 17, 2025  
Charleston, South Carolina

RECEIVED

Dec 17 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE CHARLESTON COUNTY CIRCUIT COURT

Frank R. Addy, Presiding Judge

---

Appellate Case No. 2025-001315

(Civil Action No. 2022-CP-10-05192)

---

South Carolina Coastal Conservation League  
and Charleston Waterkeeper ,..... Appellants,

v.

South Carolina Department of Health and Environmental Control ..... Respondent.

---

**CERTIFICATE OF SERVICE**

---

The undersigned hereby certifies that on this date she has served the Respondent’s ***Motion for Extension of Time to File Respondent’s Initial Brief and Designation of Matter*** in this matter upon the following by emailing a copy of same to the email addresses below:

Leslie S. Lenhardt, Esquire  
Amy E. Armstrong, Esquire  
Monica Whalen, Esquire  
South Carolina Environmental Law Project  
510 Live Oak Dr.  
Mt. Pleasant, SC 29464  
[leslie@scelp.org](mailto:leslie@scelp.org)  
[amy@scelp.org](mailto:amy@scelp.org)  
[monica@scelp.org](mailto:monica@scelp.org)

  
\_\_\_\_\_  
Janet H. DeBruhl

December 17, 2025