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Jul 29 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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

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.

**NOTICE OF SUBSTITUTION OF COUNSEL OF RESPONDENTS JIM YOUNG,
D/B/A J. YOUNG BROILERS, AND HEATH COGGINS BROILERS**

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*Attorneys for Respondents Jim Young, d/b/a
J. Young Broilers, and Heath Coggins Broilers*

Respondents Jim Young d/b/a J. Young Broilers and Heath Coggins Broilers ("Respondents), by and through their undersigned counsel, hereby request that this Court substitute Kirsten E. Small of Maynard Nexsen PC, as counsel of record for Respondents, in place of their prior counsel, Michael S. Traynham and Joan Wash Hartley of the same firm, Maynard Nexsen PC. W. Thomas Lavender, Jr. will remain counsel for Respondents.

Respectfully submitted,

s/ Michael S. Traynham

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*Attorneys for Respondents Jim Young, d/b/a J. Young
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PROOF OF SERVICE

This is to certify that the foregoing Notice of Substitution of Counsel of Respondents Jim Young, d/b/a J. Young Broilers, and Heath Coggins Broilers has been served on counsel of record via electronic mail as noted below, this 29th day of July, 2026:

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s/ Michael S. Traynham
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J. Young Broilers, and Heath Coggins Broilers*



Michael S. Traynham
Of Counsel
Admitted in SC, NC

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SC Court of Appeals

VIA ELECTRONIC MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: **Respondents' Notice of Substitution of Counsel**
South Carolinians for Responsible Agricultural Practices v. South
Carolina Department of Environmental Services, Jim Young, and 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:

Enclosed for filing in the above-referenced matter, please find Respondents' Jim Young, d/b/a J. Young Broilers, and Heath Coggins Broilers Notice of Substitution of Counsel and Proof of Service. By copy of this letter, I am serving counsel for all parties via electronic mail. Thank you for your assistance with this matter.

Respectfully,

A handwritten signature in blue ink, appearing to read "Michael Traynham", written over a horizontal line.

Michael S. Traynham

MST/saw
Enclosures

The Honorable Jenny Abbott Kitchings
July 29, 2026
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cc: Stephen P. Hightower, Esquire
Bennett W. Smith, Esquire
Emily S. Poole, Esquire
Lauren Megill Milton, Esquire