

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Administrative Law Judge

Case No. 13-ALC-07-056-CC
Appellate Case No. 2014-000847

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SC Court of Appeals

Preservation Society of Charleston, Historic Charleston Foundation, Historic Ansonborough Neighborhood Association, South Carolina Coastal Conservation League, Charlestowne Neighborhood Association, Charleston Chapter of the Surfrider Foundation, Charleston Communities for Cruise Control,

Appellants,

vs.

South Carolina Department of Health and Environmental Control and
South Carolina State Ports Authority,

Respondents.

**MOTION FOR EXTENSION OF TIME FOR
FILING INITIAL BRIEF OF APPELLANTS**

TO: ALL PARTIES AND THE COURT OF APPEALS:

PLEASE TAKE NOTICE that the Appellants hereby move the Court of Appeals for an Order extending the time for filing its Initial Brief and Designation of Matter. The Initial Brief and Designation are due June 20, 2014, and the Appellants seek an extension of thirty (30) days, until July 21, 2014. The basis of this motion is as follows:

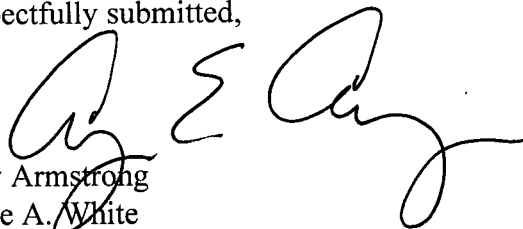
The Appellants are represented by multiple attorneys who are working together on this matter. Undersigned counsel has long-standing family vacation plans from June 16 through June 23, 2014, and thus will be out of the office and unable to work on the brief the week leading up

to the current deadline. While progress has been made toward filing the initial brief, counsel for the Appellants need more time to conduct research, coordinate drafting and editing and adequately prepare this brief and designation.

Counsel for the Appellants has consulted with counsel for the Respondent SCDHEC and Respondent SCSPA, both of whom consent to this requested extension.

WHEREFORE, the Appellants request that the Court of Appeals enter an order extending the time for filing its Initial Brief and Designation of Matter until July 21, 2014.

Respectfully submitted,



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Michael G. Corley
South Carolina Environmental Law Project
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*Counsel for Preservation Society of Charleston and
Coastal Conservation League*

Georgetown, South Carolina

June 14, 2014

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Administrative Law Judge

Case No. 13-ALC-07-056-CC

Preservation Society of Charleston, Historic Charleston Foundation, Historic Ansonborough Neighborhood Association, South Carolina Coastal Conservation League, Charlestowne Neighborhood Association, Charleston Chapter of the Surfrider Foundation and Charleston Communities for Cruise Control,

Appellants,

v.

South Carolina State Ports Authority and South Carolina Department of Health and Environmental Control,

Respondents.

CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing Motion for Extension of Time on Respondents SCSPA and SCDHEC by placing copies of same in the U.S. Mail addressed to:

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Georgetown, South Carolina

June 14, 2014



Amy E. Armstrong

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SC Court of Appeals



The South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

June 14, 2014

a 501c3
non-profit organization

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

Re: Preservation Society of Charleston, et al. v. S.C. State
Ports Authority & SCDHEC;
Appellate Case No. 2014-000847

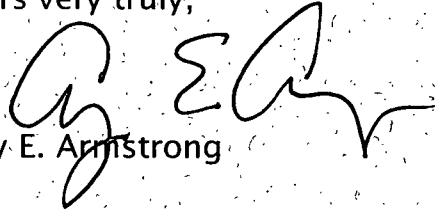
Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of my Motion for Extension for Filing Initial Brief of Appellants, along with my Certificate of Service and filing fee.

Please return a clocked-in copy in the self-addressed, stamped envelope provided.

Thank you very much for your kind cooperation and assistance.

Yours very truly,

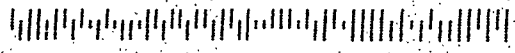

Amy E. Armstrong

cc: Brad Churdar, Esquire
Randolph Lowell, Esquire
Jefferson Leath, Esquire
Philip L. Lawrence, Esquire
J. Blanding Holman, IV, Esquire

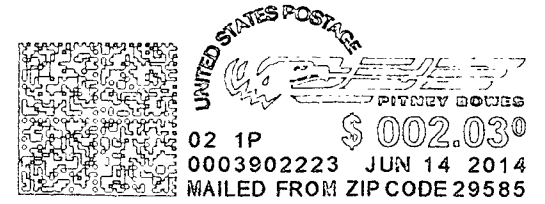
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SC Court of Appeals

Honorable Jenny Abbott Kitchings
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