

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph K. Anderson, III, Chief Administrative Law Judge

Case No. 2014-000847

RECEIVED

JUL 17 2014

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, and Charleston
Communities for Cruise Control,Appellants,

v.

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

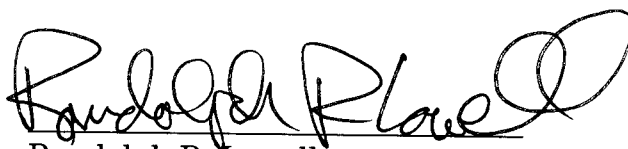
MOTION FOR EXTENSION OF TIME

Respondent South Carolina State Ports Authority (Ports Authority)
respectfully moves the Court for an extension of time to file their reply to
Cruise Opponents' Return to South Carolina State Ports Authority's Motion
to Dismiss Appeal. In support of this Motion, the Ports Authority states as
follows:

1. The Cruise Opponents' filed their Return to South Carolina State Ports Authority's Motion to Dismiss Appeal on Monday, July 14, 2014.
2. The Ports Authority's reply to such return is due to be filed Monday, July 21, 2014.
3. Counsel for Respondent Ports Authority requests an extension of time of five (5) days to file its reply to the Cruise Opponents' Return to South Carolina State Ports Authority's Motion to Dismiss Appeal due to time constraints for personal and work obligations.
4. If the Court grants this request, Counsel for Respondent Ports Authority calculates that the Ports Authority will have until Monday, July 28, 2014 to file its reply.
5. This is the first request for an extension by Counsel for Respondent Ports Authority.

Counsel for the Ports Authority therefore respectfully requests that this Court grant this Motion and extend the time for Respondent Ports Authority to file its reply to the Cruise Opponents' Return to South Carolina State Ports Authority's Motion to Dismiss Appeal until Monday, July 28, 2014.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Randolph R. Lowell". The signature is written in a cursive style with a horizontal line underneath the name.

Randolph R. Lowell
Tracey C. Green
Chad N. Johnston
WILLOUGHBY & HOEFER, P.A.
Post Office Box 8416
Columbia, SC 29202-8416
rlowell@willoughbyhoefer.com
tgreen@willoughbyhoefer.com
cjohnston@willoughbyhoefer.com

Philip L. Lawrence
General Counsel
S.C. STATE PORTS AUTHORITY
Post Office Box 22287
Charleston, SC 29413-2287
plawrence@scspa.com

*Attorneys for Respondent South
Carolina State Ports Authority*

July 17, 2014
Columbia, South Carolina

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Certificate of Service

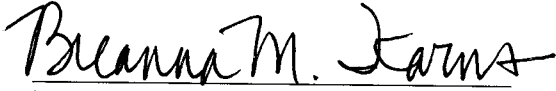
This is to certify that I, a paralegal with the law firm Willoughby & Hoefer, P.A., have caused to be served this day one (1) copy of the **South Carolina Ports Authority's Motion for Extension of Time** by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

Amy Armstrong, Esquire
South Carolina Environmental Law Project
Post Office Box 1380
Pawley's Island, SC 29585

Jefferson Leath, Esquire
Leath, Bouch & Seekings, LLP
92 Broad Street
Charleston, SC 29401

Bradley D. Churdar, Esquire
**South Carolina Department of
Health and Environmental Control**
1362 McMillan Avenue, Suite 400
North Charleston, SC 29405

J. Blanding Holman, Esquire
Southern Environmental Law Center
43 Broad Street, Suite 300
Charleston, SC 29401


Breanna M. Karns

Columbia, South Carolina
This 17th day of July 2014

WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW
930 RICHLAND STREET
P.O. BOX 8416
COLUMBIA, SOUTH CAROLINA 29202-8416

MITCHELL M. WILLOUGHBY
JOHN M.S. HOEFER
RANDOLPH R. LOWELL**
TRACEY C. GREEN
BENJAMIN P. MUSTIAN**
ELIZABETH ZECK*
ELIZABETHANN LOADHOLT CARROLL
CHAD N. JOHNSTON
JOHN W. ROBERTS
ANDREW J. D'ANTONI

AREA CODE 803
TELEPHONE 252-3300
TELECOPIER 256-8062

*ALSO ADMITTED IN TX

**ALSO ADMITTED IN THE DISTRICT OF COLUMBIA

July 17, 2014

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

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

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of the Respondent South Carolina Ports Authority's Motion for Extension of Time along with a Certificate of Service. Please file-stamp the extra copy and return it via my courier.

Thank you for your time and consideration. If you have any questions or if you need any additional information, please do not hesitate to contact me.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.



Randolph R. Lowell

Enclosures

cc: Amy Armstrong, Esquire
Jefferson Leath, Esquire
Bradley D. Churdar, Esquire
J. Blanding Holman, Esquire
Philip L. Lawrence, Esquire

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