

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

APPEAL FROM THE ADMINISTRATIVE LAW COURT

OCT 21 2014

Ralph King Anderson, III, Administrative Law Judge

SC Court of Appeals

73912

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

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.

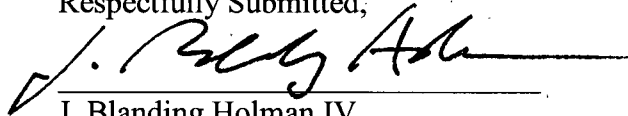
MOTION TO AMEND APPELLANTS' INITIAL BRIEF

TO: THE COURT OF APPEALS OF SOUTH CAROLINA, AND THE RESPONDENTS:

PLEASE TAKE NOTICE that the Appellants 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 (collectively, "Community Groups") hereby move the Court of Appeals, pursuant to Rule 204, SCACR, to amend their initial brief.

The Community Groups filed their Initial Brief on October 14, 2014. In this Initial Brief, the Community Groups inadvertently omitted a separate Statement of Issues on Appeal and Statement of the Case directed by Rule 208(B) and (C), SCACR, although the substance of both was included in the brief. The Groups move this Court for leave to amend their Initial Brief to include the Statement of Issues on Appeal and Statement of the Case. A copy of the Amended Initial Brief reflecting these changes is attached to this Motion. Counsel for the Community Groups has conferred with Respondents' counsel. SPA's takes no position at this time, and DHEC has "[n]o objection to you filing the motion."

Respectfully Submitted,



J. Blanding Holman IV
Southern Environmental Law Center
43 Broad Street, Suite 300
Charleston, SC 29401
Telephone: (843) 720-5270
Fax: (843) 720-5240

Jefferson Leath
Leath, Bouch & Seekings, LLP
92 Broad Street
Charleston, SC 29401
Telephone: (843) 513-1076

Amy E. Armstrong
Jessie A. White
South Carolina Environmental Law Project
Mailing Address: Post Office Box 1380
Pawleys Island, SC 29585
Physical Address: 430 Highmarket Street
Georgetown, SC 29440
Telephone: (843) 527-0078
Fax: (843) 527-0540

Attorneys for the Appellants

Charleston, SC
October 17th, 2014

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Administrative Law Judge

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

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

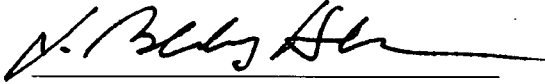
CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing Motion to Amend Appellants'
Initial Brief on Respondents S.C. State Ports Authority and SC DHEC by placing copies of same
in the U.S. Mail addressed to:

Randolph R. Lowell, Esq.
Chad N. Johnston
Willoughby & Hoefler, PA
Post Office Box 8416
Columbia, SC 29202

Philip L. Lawrence, Esq.
General Counsel
S.C. State Ports Authority
Post Office Box 22287
Charleston, SC 29413-2287

Bradley Churdar, Esq.
SC DHEC/OCRM
1362 McMillan Avenue, Suite 400
Charleston, SC 29405



J. Blanding Holman IV

Charleston, SC
October 7th, 2014

SOUTHERN ENVIRONMENTAL LAW CENTER

Telephone 843-720-5270

43 BROAD STREET, SUITE 300
CHARLESTON, SC 29401-3051

Facsimile 843-720-5240

October 17, 2014

Honorable V. Claire Allen
Deputy Clerk, Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Preservation Society of Charleston v. DHEC
Appellate Case No. 2014-000847

Dear Ms. Allen:

Enclosed please find the original and seven copies each of Appellants' Motion to Amend the Initial Brief and the Amended Initial Brief, filed on behalf of 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. I have also included the filing fee for the Motion.

Please file-stamp the additional copies of the Motion and Brief and return them to me in the self-addressed, stamped envelope provided.

Thank you very much for your kind cooperation and assistance.

Very truly yours,



J. Blanding Holman
Attorney for Appellants

Cc: All Counsel of Record

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SC Court of Appeals

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Honorable V. Claire Allen
Deputy Clerk, Court of Appeals
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