

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Docket No. 12-ALJ-07-0434-CC

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SC Court of Appeals

Ken Bruning, Janet Bruning, David Feron, individually and as Trustee,
Mary Feron, individually and as Trustee, Sally Saegmuller Haley and
Terrell Page Haley, individually and as Co-Trustees, Martha James
and Don Haarmeyer, individually and as Co-Trustees, and Pamela S. North Appellants,

vs.

South Carolina Department of Health and Environmental Control
and Cat Island POA, c/o Gary Meyer Respondents,

In Re: Garfield Park Phase 3.

Cat Island POA, c/o Gary Meyer Petitioner,

vs.

SCDHEC Respondent.

In Re: Garfield Park Phase 3.

**RESPONDENTS' JOINT MOTION FOR EXTENSION OF TIME TO FILE
RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

TO: THE COURT AND COUNSEL FOR ALL PARTIES:

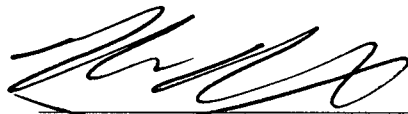
PLEASE TAKE NOTICE that, pursuant to Rule 263, SCACR, the Respondents, South
Carolina Department of Health and Environmental Control and Cat Island POA, c/o Gary Meyer,
hereby respectfully move before this Court for an Order extending the time for filing its Initial
Brief and Designation of Matter to be Included in the Record on Appeal. The deadline for

submission of the Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal is December 19, 2014. The Respondents seek an extension of forty-five (45) days, making the Respondent's deadline for filing its Initial Brief and Designation of Matter to be Included in the Record on Appeal February 2, 2014. The basis for this motion is as follows:

This extension is requested due to Respondents' respective counsel's work load, as well as reduced work schedule due to the holidays. In addition, both Respondents' counsel has ongoing personal and family medical concerns that will require time away from work and travel for Department Counsel.

WHEREFORE, the Respondents respectfully move before this Court for an Order extending the time for filing its Initial Brief and Designation of Matter to be Included in the Record on Appeal until February 2, 2014. The Department respectfully requests that all other deadlines be held in abeyance pending the Court's approval of this extension.

Respectfully Submitted,



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Staff Counsel
South Carolina Department of Health and
Environmental Control
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Attorney for Respondent SCDHEC

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Attorneys for Respondent Cat Island c/o Gary Meyer

December 15, 2013
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Docket No. 12-ALJ-07-0434-CC

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Mary Feron, individually and as Trustee, Sally Saegmuller Haley and
Terrell Page Haley, individually and as Co-Trustees, Martha James
and Don Haarmeyer, individually and as Co-Trustees, and Pamela S. North Appellants,

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South Carolina Department of Health and Environmental Control
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CERTIFICATE OF SERVICE

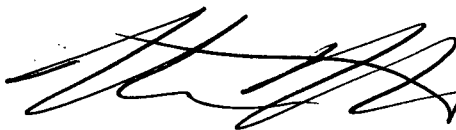
The undersigned hereby certifies that she has this day served the *Respondents' Joint Motion for Extension to file Respondent's Initial Brief and Designation of Matter* via U.S. First Class Mail, postage pre-paid to the following:

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Mary D. Shahid, Esquire
Angelica M. Colwell, Esquire
Nexsen Pruet
Post Office Box 486
Charleston, SC 29402

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John E. North, Jr., Esquire
North & Black
916 Bay Street, Suite 100
Beaufort, SC 29902

A handwritten signature in black ink, appearing to read 'Nathan M. Haber', written over a horizontal line.

Nathan M. Haber

December 15, 2013



Catherine B. Templeton, Director

Promoting and protecting the health of the public and the environment

December 15, 2014

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: *Bruning, et al. v. SCDHEC, et al.*
Case Tracking No.: 2014-002010

Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of the Respondent's Joint Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced case.

By copy of this letter, I am serving all parties of record:

I would appreciate your returning a clocked copy in the enclosed envelope.

Very truly yours,

Nathan M. Haber
Counsel

NMH/mdc

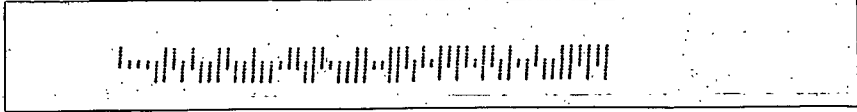
cc: John E. North, Jr., Esquire
Mary D. Shahid, Esquire
Angélica M. Colwell, Esquire

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SC Court of Appeals



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Ocean & Coastal Resource Management

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Return Service Requested

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
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