



The South Carolina Environmental Law Project
Lawyers for the Wild Side of South Carolina

December 18, 2014

a 501c3
non-profit organization

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Executive Director
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Staff Attorney

Honorable Jenny Abbott Kitchings
Clerk, Court of Appeals
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DEC 22 2014

SC Court of Appeals

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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 Reply 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,

Jessie A. White

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

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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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SC 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

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 Reply Brief. The Reply Brief is due January 2, 2015, and the Appellants seek an extension of ten (10) days, until January 12, 2015. The basis of this motion is as follows:

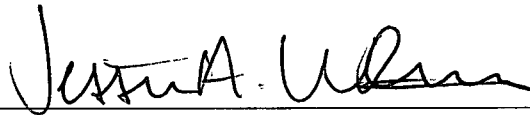
The offices of counsel for the Appellants will be closed for several days next week and the following week in light of the upcoming holidays and in order to accommodate various travel plans. Since the Appellants' Reply Brief is presently due the day immediately after the New

Years holiday, counsel requests an extension of time to commence briefing on this matter. Additionally, co-counsel is in the midst of relocating office buildings, making coordination between counsel and the creation of a final product more difficult, as well as contributing to the already hectic time of year.

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 Reply Brief until January 12, 2015.

Respectfully submitted,



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Georgetown, South Carolina

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

SC Court of Appeals

Ralph King Anderson, III, Administrative Law Judge

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

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Appellants,

v.

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

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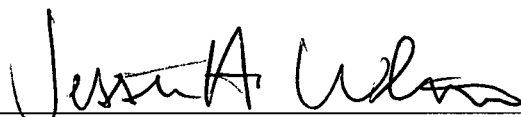
CERTIFICATE OF SERVICE

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:

Randolph R. Lowell, Esquire
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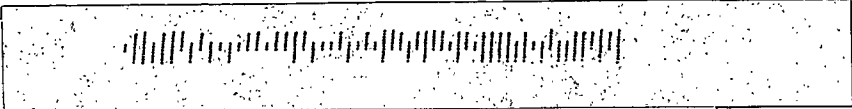
Bradley Churdar, Esquire
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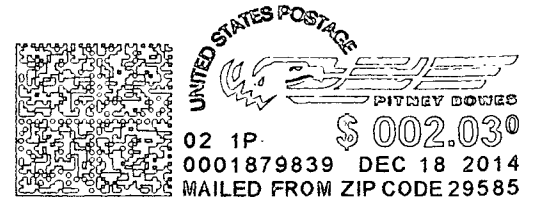
Jessie A. White

Georgetown, South Carolina

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