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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Case No. 14-ALJ-07-0282-CC

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APR 13 2015

SC Court of Appeals

Dan Abel and Mary Abel,

Appellants,

vs.

South Carolina Department of Health and Environmental Control and  
Pawleys Island Community Church,

Respondents.

**MOTION FOR EXTENSION OF TIME  
FOR FILING INITIAL BRIEF AND DESIGNATION  
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 on April 15, 2015, and the Appellants seek an extension of thirty (30) days, until May 15, 2015. The basis of this motion is as follows:

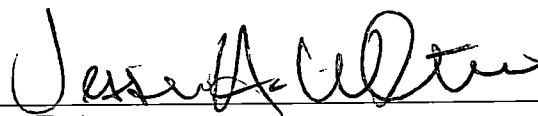
Counsel for the Appellants are presently preparing for an upcoming trial in another case, which is scheduled for April 14, 2015 through April 17, 2015, and which has demanded a significant amount of the time and resources of counsel's small office. Since the deadline for filing Appellants' Initial Brief and Designation currently falls on a date when counsel will be out

of the office and in the middle of trial on a separate matter, counsel requests an extension of time to commence briefing the above-captioned case.

Counsel for the Appellants has consulted with counsel for the Respondent SCDHEC and Respondent Pawleys Island Community Church, 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 until May 15, 2015.

Respectfully submitted,



Amy E. Armstrong  
Jessie A. White  
SOUTH CAROLINA ENVIRONMENTAL LAW  
PROJECT

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*Counsel for Appellants*

Georgetown, South Carolina

April 8, 2015

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

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Case No. 14-ALJ-07-0282-CC

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Appellants,

Respondents.

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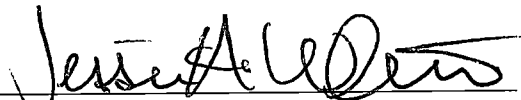
**CERTIFICATE OF SERVICE**

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I hereby certify that on this date I served the foregoing Motion for Extension of Time for Filing Initial Brief and Designation of Appellants on Respondents SCDHEC and Pawleys Island Community Church by placing copies of same in the U.S. Mail addressed to:

Daniel W. Stacy, Jr., Esquire  
Oxner & Stacy, PA  
90 Wall Street  
Pawleys Island, SC 29585

Nathan M. Haber, Esquire  
SCDHEC/OCRM  
1362 McMillan Avenue, Suite 400  
Charleston, SC 29405

  
\_\_\_\_\_  
Jessie A. White

Georgetown, South Carolina  
April 8, 2015



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

April 8, 2015

a 501c3  
non-profit organization

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

Re: Dan Abel and Mary Abel v. SCDHEC and Pawleys Island  
Community Church;  
Docket No. 14-AJ-07-0282-CC

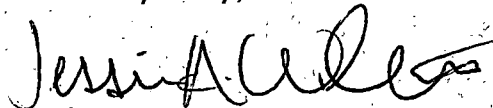
Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of the Appellants' Motion for Extension of Time to File Initial Brief and Designation, 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: Nathan M. Haber, Esq.  
Daniel W. Stacy, Jr., Esq.

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APR 13 2015

SC Court of Appeals

COLUMBIA SC 292

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**SC Court of Appeals**

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