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MAY 14 2015

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Appellant Case No. 2015-000602

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 Dan and Mary Abel 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 May 15, 2015, and the Appellants seek an extension of thirty (30) days, until June 15, 2015. This is the second request for an extension. The basis of this motion is as follows:

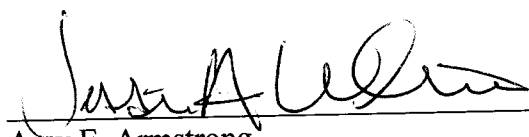
Counsel for the Appellants are a small, public interest law firm consisting of three attorneys and a single support staff, with two of the attorneys, including the undersigned, still relatively inexperienced lawyers within their first few years of practice. Counsel maintains a

heavy case load as well as certain obligations associated with operations of a non-profit organization. Most recently, counsel had been preparing for a week long trial which just recently concluded and has become engaged in several new legal matters all of which have required significant time and resource commitments. Further, one of the attorneys will be out of the country from May 10th through the 18th and the undersigned will be out of the state for a family member's graduation from May 14th until the 17th. While progress has been made on the Initial Brief and Designation, the combination of these multiple obligations are preventing counsel from being able to devote the time and energy necessary to adequately and thoroughly prepare the brief in this matter. Therefore, counsel respectfully requests an additional extension of time to complete its brief.

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 respectfully request that the Court of Appeals enter an order extending the time for filing its Initial Brief and Designation until June 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

May 11, 2015

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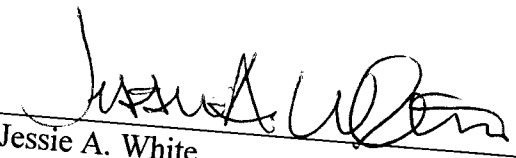
Respondents.

CERTIFICATE OF SERVICE

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
May 11, 2015



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

May 11, 2015

a 501c3
non-profit organization

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P.O. Box 11629
Columbia, SC 29211

Re: Dan Abel and Mary Abel v. SCDHEC and Pawleys Island
Community Church;
Appellate Case No. 2015-000602

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SC Court of Appeals

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.

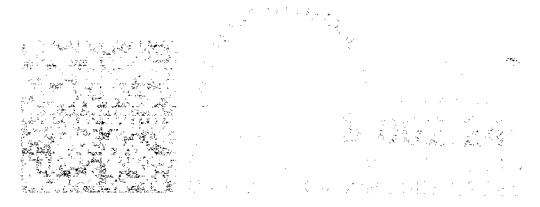
Thank you very much for your kind cooperation and assistance.

Yours very truly,

Jessie A. White

cc: Nathan M. Haber, Esq.
Daniel W. Stacy, Jr., Esq.

Environmental Law Project
Post Office Box 1380
Pawleys Island, SC 29585



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