

76912

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Appeal from the Administrative Law Court
Shirley C. Robinson, Administrative Law Judge

RECEIVED

AUG 12 2015

SC Court of Appeals

Appellate Case No. 2015-000602

Dan Abel and Mary Abel,

Appellants,

v.

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

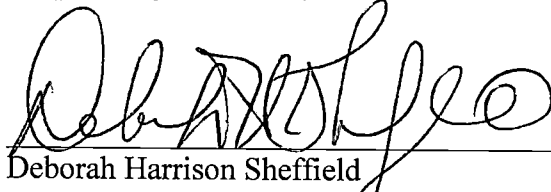
Respondents.

Motion for Extension of Time

Pursuant to the prior orders of this Court, the initial brief and designations of both Respondents are due on August 14, 2015. The Respondents are attempting to coordinate a joint Respondents' brief, and the undersigned Counsel for the Respondent Church does not anticipate that she will be able to coordinate with the other Respondents' counsel and complete this project by this Friday's deadline due to other work projects and family commitments with children returning to college/school. I have consulted with Counsel for the Appellant who has kindly consented to the extension request as evidenced by her email submitted herewith.

WHEREFORE, the Respondents respectfully requests a thirty-day extension of time to file and serve their initial brief and designations.

Respectfully submitted,



Deborah Harrison Sheffield
Law Office of Deborah Harrison Sheffield, P.A.
117 Brook Valley Road
Columbia, South Carolina 29224
(803) 419-7837 // (803) 419-3519 FAX

Daniel W. Stacy, Jr.
Oxner & Stacy, P.A.
90 Wall Street, Unit B
Pawleys Island, SC 29585
(843) 235-6747 // 843-235-6650 FAX

Attorneys for Respondent
Pawleys Island Community Church

RECEIVED

August 11, 2015

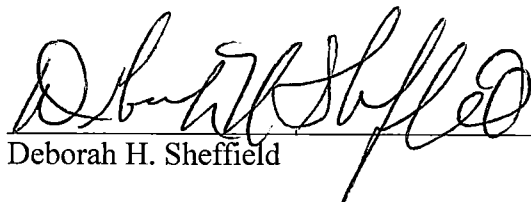
AUG 12 2015

Certificate of Service **SC Court of Appeals**

I certify that on this 11th day of August, 2015, a copy of the foregoing motion was served on the Appellants and the Respondent DHEC by depositing said copy in the U.S. Mail, with sufficient first class postage, addressed to their Counsel of Record of as listed below:

Amy E. Armstrong
Jessie A. White
S.C. Environmental Law Project
Post Office Box 1380
Pawleys Island, SC 29585

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


Deborah H. Sheffield

Subj: **Re: Abel v. Pawleys Island Church/SCDHEC - Appeal No. 2015-000602**
Date: 8/6/2015 5:01:56 P.M. Eastern Daylight Time
From: jessie@scelp.org
To: Dhsheffieldatty@aol.com
CC: dstacy@oxnerandstacy.com, habernm@dhec.sc.gov

Deborah,

Sorry I missed your call, I've been out of the office most of the afternoon. I'm happy to consent to another 30 day extension.

Have a great weekend.
Jessie

--
Jessie A. White
Staff Attorney
S.C. Environmental Law Project
P.O. Box 1380
Pawleys Island, SC 29585
Phone: (843) 527-0078
Fax: (843) 527-0540
jessie@scelp.org

----- Original message -----
From: Dhsheffieldatty@aol.com
To: jessie@scelp.org
Cc: dstacy@oxnerandstacy.com, habernm@dhec.sc.gov
Subject: Abel v. Pawleys Island Church/SCDHEC - Appeal No. 2015-000602
Date: Thu, 6 Aug 2015 14:21:23 -0400

Ms. White -- As you may be aware from my appearance letter, I have been associated by Dan Stacy to assist with this appeal. The Respondents' initial briefs/designations are currently due next Friday, August 14, 2015. I called and left a message about seeking your consent to a second extension request on behalf of both Respondents - the Church and SC DHEC, but I wanted to follow-up with this email. Family commitments with my children here at the end of summer have consumed much of my time and I do not anticipate that I will be able to complete the brief by next Friday, so I will be asking the Court for an additional 30 day extension. Please let me know if you will consent so I can get a motion in the mail to the Court. Thanks,
Deborah
Sheffield

Deborah H. Sheffield
Law Office of Deborah Harrison Sheffield, PA
117 Brook Valley Rd.
Columbia, SC 29223
803-419-7837
803-419-3519 FAX

CONFIDENTIALITY NOTICE: This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, and is legally privileged. This email (and any associated files) contains confidential and/or legally

privileged information from the Law Office of Deborah Harrison
Sheffield, PA,
intended solely for the use of the individual(s) named in this email.
If you are
not the intended recipient, you are notified that any disclosure,
copying,
distribution, or the taking of any action based or in reliance upon the
contents of this email (and any associated files) is strictly
prohibited. If
you have received this email in error, please destroy this email and
notify
our office via reply email.