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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

Appellant Case No. 2015-000602

RECEIVED

SEP 22 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 REPLY BRIEF 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 their Initial Reply Brief in this matter. The Initial Reply Brief is due on September 24, 2015, and the Appellants seek an extension of two (2) weeks, until October 8, 2015. This is the first request for such extension. The basis of this motion is as follows:

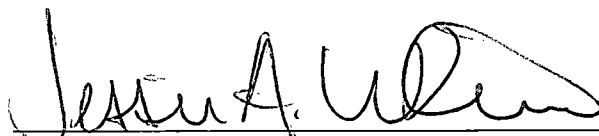
The Respondents South Carolina Department of Health and Environmental Control ("DHEC") and Pawleys Island Community Church (the "Church") served their Initial Brief in response to Appellants' Initial Brief on September 14, 2015. Counsel received a copy of Respondents' brief on September 17, 2015.

Over the next two weeks, counsel for Appellants have several significant filing deadlines and conflicts that will impede counsel's ability to spend the necessary time and resources to adequately respond to the Respondents' brief. Those filing deadlines include an initial reply and initial response brief with this Court in an unrelated matter, a response to a dispositive motion with the circuit court, and a filing with the Administrative Law Court. In addition, counsel's public interest firm is presently understaffed with only one support staff to manage the firm and support its three attorneys which is causing counsel to assume additional support and/or non-legal responsibilities. Therefore, counsel respectfully requests an extension of time in order to thoroughly respond and submit its reply brief.

Counsel for Appellants has consulted with counsel for Respondents SCDHEC and the 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 Reply Brief until October 8, 2015.

Respectfully submitted,



Amy E. Armstrong

Jessie A. White

SOUTH CAROLINA ENVIRONMENTAL LAW  
PROJECT

Mailing address: Post Office Box 1380  
Pawleys Island, SC 29585

Office address: 430 Highmarket Street  
Georgetown, SC 29440

Telephone (843) 527-0078

FAX (843) 527-0540

Georgetown, South Carolina  
September 18, 2015

*Counsel for Appellants*

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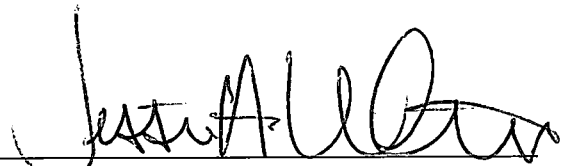
CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing Motion for Extension of Time for Filing Initial Reply Brief 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

Deborah Harrison Sheffield, Esquire  
Law Office of Deborah Harrison Sheffield, P.A.  
117 Brook Valley Road  
Columbia, SC 29223

  
Jessie A. White

Georgetown, South Carolina  
September 18, 2015



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

September 18, 2015

a 501c3  
non-profit organization

**Amy E. Armsirong**  
Executive Director  
**Amelia A. Thompson**  
Staff Attorney  
**Jessie A. White**  
Staff Attorney

**OFFICE ADDRESS**  
430 Highmarket Street  
Georgetown, SC 29440

**MAILING ADDRESS**  
P.O. Box 1380  
Pawleys Island, SC 29585

(843) 527-0078  
Fax (843) 527 0540  
E-mail amy@scelp.org  
amelia@scelp.org  
jessie@scelp.org

**BOARD OF DIRECTORS**

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P.O. Box 11629  
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SEP 22 2015

SC Court of Appeals

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

Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of the Appellants' Motion for Extension of Time for filing their Initial Reply Brief, 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.  
Deborah H. Sheffield, Esq.

**S.C. Environmental Law Project  
Post Office Box 1380  
Pawleys Island, SC 29585**



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SEP 22 2015  
SC Court of Appeals

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