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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 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 October 8, 2015, and the Appellants seek an extension of one (1) week, until October 15, 2015. This is the second request for such extension. The basis of this motion is as follows:

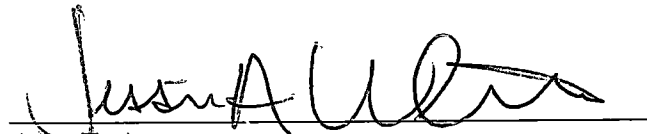
Counsel's office is located in the historic district of Georgetown, South Carolina, one of the areas hardest hit by flooding and weather-related impacts across the state over the past several days. Roads, government offices, the courts, schools, and other businesses have all been closed, and family and friends have had to stay in town with employees of counsel for longer than anticipated. These

events have significantly disrupted normal operations of counsel's office and interfered with counsel's ability to spend any time on this brief. 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 15, 2015.

Respectfully submitted,



Amy E. Armstrong

Jessie A. White

SOUTH CAROLINA ENVIRONMENTAL LAW  
PROJECT

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Georgetown, South Carolina  
October 6, 2015

*Counsel for Appellants*

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Appellant Case No. 2015-000602

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**CERTIFICATE OF SERVICE**

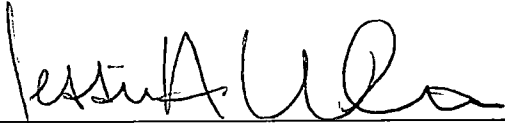
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I hereby certify that on this date I served the foregoing Motion for Extension of Time for Filing Initial Reply Brief of Appellants on Respondents SCDHEC and Pawleys Island Community Church by placing copies of same in the U.S. Mail addressed to:

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  
October 6, 2015



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

a 501c3  
non-profit organization

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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;  
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.

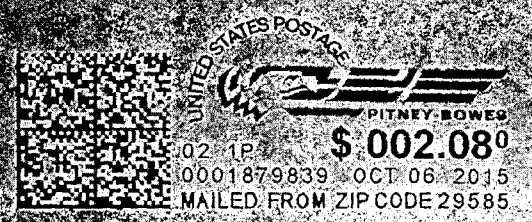
Yours very truly,

  
Jessie A. White

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

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**C. Environmental Law Project**  
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**Pawleys Island, SC 29585**



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