

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

OCT 15 2015

SC Court of Appeals

APPEAL FROM ADMINISTRATIVE LAW COURT

Hon. Ralph King Anderson, III, Administrative Law Judge

Lower Court Case No. 15-ALJ-07-0258-CC  
Appellate Case No.: 2015-001989

Tract 7, LLC,

Appellant,

v.

South Carolina Department of Health  
and Environmental Control, and BP Amoco  
Chemical Company, Cooper River Plant,

Respondents.

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**MOTION FOR EXTENSION OF TIME**

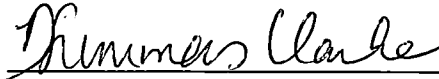
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Pursuant to South Carolina Appellate Court Rule 263(b), Appellant Tract 7, LLC, moves for an extension of thirty (30) days from the existing deadline to file its Initial Brief and Designation of Matter in the above captioned matter. Appellant's Initial Brief is now due on or before October 19, 2015. Appellant requests an extension of thirty (30) days to file its Initial Brief and Designation of Matter.

Appellant's Initial Brief and Designation of Matter will be due on or before November 18, 2015, if the extension is granted. Appellant's counsel has conferred with counsel for Respondents regarding this motion, and counsel for Respondents consent to the thirty (30) day extension.

Respectfully submitted,

BARNWELL WHALEY  
PATTERSON & HELMS, LLC



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M. Dawes Cooke, Jr.  
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D. Summers Clarke, II  
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***Attorneys for Appellant Tract 7, LLC***

October 12, 2015

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Hon. Ralph King Anderson, III, Administrative Law Judge

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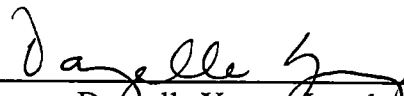
**PROOF OF SERVICE**

I, the undersigned, of the law offices of Barnwell Whaley Patterson & Helms, LLC, attorneys for Appellants, do hereby certify that I have served all counsel in this action with a copy of the Appellant's Motion for Extension of Time herein below specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Douglas M. Muller, Esquire  
Ben A. Hagood, Esquire  
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*Attorney for Respondent South Carolina  
Department of Health and Environmental Control*

  
\_\_\_\_\_  
Danyelle Young, Legal Assistant

October 12, 2015



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D. Summers Clarke, II  
sclarke@Barnwell-Whaley.com

October 12, 2015

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**Re: Tract 7, LLC v. South Carolina Department of Health & Environmental Health  
and BP Amoco Chemical Company  
Appellate Case No. 2015-001989**

Dear Ms. Kitchings:

Enclosed for filing are the original and seven (7) copies of Appellant Tract 7, LLC's Motion for an Extension of Time to file its Initial Brief and Designation of Matter and Proof of Service in the above-referenced case. Additionally, I have enclosed a check in the amount of \$25.00 for the filing fee. Please return a filed copy to me in the envelope provided. Thank you for your assistance.

By copy of this letter, I am serving all counsel of record with a copy of the same.

Sincerely,

D. Summers Clarke, II

Enclosures

cc: Douglas M. Muller, Esquire  
Ben A. Hagood, Esquire  
Lesley A. Firestone, Esquire  
Nathan Haber, Esquire

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**BARNWELL  
WHALEY** | **75** YEARS ■  
PATTERSON & HELMS LLC | 1938-2013

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4008.001

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
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