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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE 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.

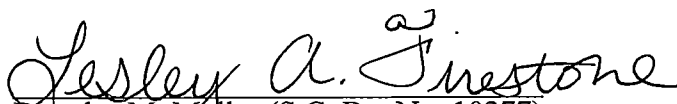
RESPONDENTS' JOINT MOTION FOR EXTENSION OF TIME

Pursuant to South Carolina Appellate Court Rule 263(b), Respondents BP Amoco Chemical Company ("BP Amoco") and South Carolina Department of Health and Environmental Control ("Respondents"), move for an extension of thirty (30) days from the existing deadline to file their Initial Briefs in this matter. Appellant served its Initial Brief on Respondents on November 16, 2015. Respondents' Initial Briefs are now due on or before December 16, 2015. Respondents request an extension of thirty (30) days to file their Initial Briefs on the grounds that counsel for the South Carolina Department of Health and Environmental Control is currently on vacation in South America and will not be returning until January 5, 2015, and Appellant was granted additional time to file its Initial Brief and Respondents would like additional time to respond.

Respondents' Initial Briefs will be due on or before January 15, 2015, if the extension is granted. BP Amoco's counsel has conferred with counsel for Appellant regarding this motion, and Appellant consents to the thirty (30) day extension for both Respondents.

For the reasons set forth herein, Respondents request a thirty (30) day extension to serve and file their Initial Briefs.

Respectfully submitted,



Douglas M. Muller (S.C. Bar No. 10277)
Ben A. Hagood (S.C. Bar No. 2436)
Lesley A. Firestone (S.C. Bar No. 100080)
Moore & Van Allen PLLC
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ATTORNEYS FOR RESPONDENT
BP AMOCO CHEMICAL COMPANY

December 14, 2015
Charleston, SC



Nathan M. Haber, SC Bar # 100480
Counsel

South Carolina Department of Health and
Environmental Control

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Attorney for Respondent SCDHEC

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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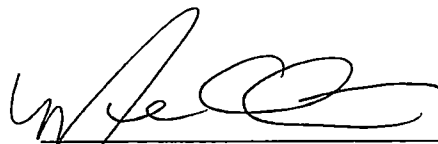
CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below I served a copy of Respondents' Joint Motion for Extension of Time by placing it in the United States Mail, with sufficient postage thereon and addressed as follows:

M.Dawes Cooke, Jr.
D. Summers Clarke, II
Barnwell Whaley Patterson & Helms, LLC
288 Meeting Street, Suite 200
Charleston, SC 29401

Attorneys for Tract 7, LLC

December 14, 2015



Melissa Altman, Legal Practice Assistant

Moore & Van Allen

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SC Court of Appeals

December 14, 2015

VIA FACSIMILE & US MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

Lesley A. Firestone
Attorney at Law

T 843 579 7027
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78 Wentworth St.
Charleston, SC 29401-1428

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**Re: Tract 7, LLC v. SCDHEC and BP Amoco Chemical Company,
Cooper River Plant; Appellate Case No. 2015-001989
MVA file No. 039124.5**

Dear Ms. Kitchings:

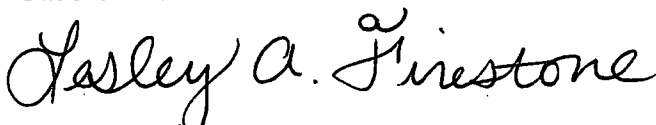
Enclosed for filing please find the original and six (6) copies of the Respondents' Joint Motion for Extension of Time in the above-referenced matter as well as a check in the amount of \$25.00 as the required filing fee. Please file the original and return a filed copy to me in the enclosed self-addressed stamped envelope.

By copy of this letter we are serving all parties of record.

Thank you for your assistance in this matter and please call me with any questions.

Sincerely,

Moore & Van Allen PLLC



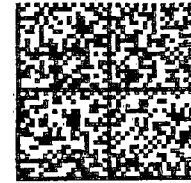
Lesley A. Firestone

LAF/maa

Enclosures: as stated

cc: Nathan M. Haber, Esq. (via e-mail with enclosure)
Bradley D. Churdar, Esq. (via e-mail with enclosure)
M. Dawes Cook, Esq.
D. Summers Clarke, II, Esq.

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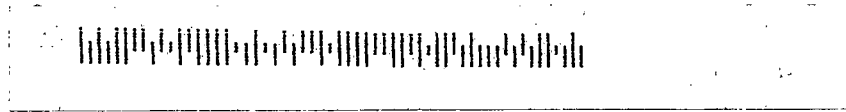
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The Honorable Jenny Abbott Kitchings
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