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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

RECEIVED

APPEAL FROM THE COURT OF COMMON PLEAS
R. Markley Dennis, Jr., Circuit Court Judge

MAR 29 2016

SC Court of Appeals

Appellate Case No. 2016-000428

James Jefferson Jowers, Sr., Andrew J. Anastos, Ben Williamson, Melanie Ruhlman and Anthony Ruhlman,

Appellants,

vs.

South Carolina Department of Health and Environmental Control,

Respondent.

MOTION FOR EXTENSION OF TIME

TO: ALL PARTIES AND THE COURT OF APPEALS:

PLEASE TAKE NOTICE that the Appellants hereby move the Court of Appeals for an Order extending their time for filing an Initial Brief on Appeal and Designation of the Record. The Brief and Designation are due March 24, 2016, and the Petitioners request an extension of thirty (30) days, until April 25, 2016. The basis of this motion is as follows:

Counsel for the Appellants recently completed an intensive trial for another case in the Administrative Law Court. Trial lasted five days and was spread out due to one witness's health condition. Over twenty witnesses testified in depositions and at trial, which concluded on March 15, 2016.

As a small nonprofit law firm with three attorneys, counsel for the Appellants has not been able to commit sufficient resources to completing the initial brief and designation of the record for

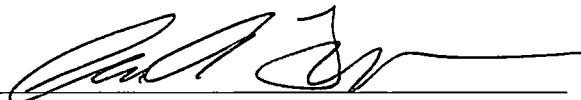
this case during the course of such an intensive trial before the ALC. The order on appeal includes multiple issues from the constitutionality of a state statute to venue to constitutional standing and will require significant time to complete.

In addition, counsel is preparing a motion to transfer on the grounds that the case involves a constitutional challenge to a state statute and counsel has simultaneously been preparing said motion.

Counsel for Appellants has consulted with counsel for Respondent DHEC who consents to this motion.

WHEREFORE, the Appellants respectfully request that the Court of Appeals enter an order extending the time for filing their Initial Brief and Designation of the Record until April 25, 2016.

Appellants further request that this Court hold deadlines in abeyance while considering this motion.



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March 24, 2016

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE COURT OF COMMON PLEAS

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Appellate Case No. 2016-000428

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SC Court of Appeals

James Jefferson Jowers, Sr., Andrew J. Anastos, Ben Williamson, Melanie Ruhlman and
Anthony Ruhlman Appellants,

vs.

South Carolina Department of Health and Environmental Control Respondent.

CERTIFICATE OF SERVICE

I hereby certify that on this date I served copies of my Motion for Extension of Time on behalf of the Appellants on counsel for all parties by placing copies of same in the United States Mail, first-class postage prepaid, addressed to:

J. Emory Smith, Jr.
Deputy Solicitor General
Office of the Attorney General
P.O. Box 11549
Columbia, SC 29211

Lisa Reynolds
Anderson, Reynolds, & Stephens, LLC
P.O. Box 87
Charleston, SC 29402



Amelia A. Thompson
Attorney for the Appellants

March 24, 2016
Georgetown, South Carolina



The South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

March 24, 2016

a 501c3
non-profit organization

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Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

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MAR 29 2016

SC Court of Appeals

Re: Jowers, et al. v. SCDHEC;
Appellate Case No. 2016-000428

Dear Ms. Kitchings:

Enclosed please find my Motion for Extension of Time in the above referenced case, 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,

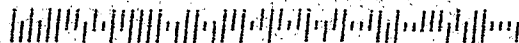
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cc: J. Emory Smith, Esquire
Lisa Reynolds, Esquire

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