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AUG 01 2016

THE STATE OF SOUTH CAROLINA

In the Supreme Court

**SC SUPREME COURT**

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

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Appellate Case No. 2016-000428

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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.

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**MOTION FOR EXTENSION OF TIME**

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TO: ALL PARTIES AND THE SUPREME COURT:

PLEASE TAKE NOTICE that the Appellants hereby move the Court for an Order extending the time for filing their Reply. The Reply is currently due July 28, 2016, and the Petitioners request an extension of ten (10) days, until August 8, 2016. The basis of this motion is as follows:

As a small nonprofit law firm with only three attorneys, and due to the ten (10) day window for filing replies, counsel for the Appellants has not been able to commit the time necessary to adequately complete the Reply for this case. Specifically, counsel has been preparing for an upcoming trial, including reviewing nearly 10,000 pages of discovery and preparing for depositions.

In addition, counsel has had other briefing and filing deadlines in both the Administrative Law Court, the Court of Appeals and an initial brief in this Court which have further prevented counsel from being able to devote the time necessary to thoroughly and adequately prepare a Reply. The Respondent's Brief raised multiple issues, some of which were not adequately anticipated in the Appellants' Initial Brief, and which will require additional analysis to clarify.

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

WHEREFORE, the Appellants respectfully request that the Court enter an order extending the time for filing their Initial Brief and Designation of the Record until August 8, 2016.

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



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July 26, 2016

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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AUG 01 2016

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APPEAL FROM THE COURT OF COMMON PLEAS **S.C. SUPREME COURT**  
BARNWELL COUNTY

The Honorable R. Markley Dennis, Jr., Judge

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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.

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**CERTIFICATE OF SERVICE**

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I hereby certify that on this date I served copies of the Appellants' Motion for Extension of Time upon counsel for the Respondent by placing same in the United States Mail, First Class Postage Prepaid, addressed to:

J. Emory Smith, Jr.  
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July 26, 2016