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November 14, 2016

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
1231 Gervais Street
Columbia, South Carolina 29201

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S.C. SUPREME COURT

RE: *Jowers et al v. S.C. Department of Health and Environmental Control*
Appellate Case No. 2016-000428

Dear Mr. Shearouse:

I have been retained by Congaree Riverkeeper Inc. for the purpose of filing a Brief of *Amicus Curiae* in this matter. In the event that the Court grants leave to file the Brief, please note my appearance for the Court's records.

Please find enclosed for filing the following:

1. The original and 7 copies of Congaree Riverkeeper's Motion for Leave to File Brief of *Amicus Curiae*, along with the original and 15 copies of the proposed amicus brief for conditional filing; and
2. The original and 1 copy of a Verified Application for Admission *Pro Hac Vice* of John D. Echeverria; and
3. The original and 7 copies of Congaree Riverkeeper's Motion to Admit John D. Echeverria *Pro Hac Vice* as co-counsel for Congaree Riverkeeper in its proposed amicus brief; and
4. An original and one copy of a certificate of service on counsel of record in this appeal.

Please return the additional file-stamped copies to me. I have also included two checks each in the amount of \$25.00 for filing these two motions. A check for the \$250.00 *Pro Hac Vice* Application filing fee is enclosed as well. If you have any questions, please do not hesitate to call.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. McMullen Taylor".

M. McMullen Taylor

enclosures

cc: Bill Stangler, Congaree Riverkeeper

John D. Echeverria, Vermont School of Law

Amy E. Armstrong

Amelia A. Thompson

Jessie A. White

South Carolina Environmental Law Project

The Honorable Alan Wilson, Attorney General of South Carolina

Robert D. Cook, Solicitor General

J. Emory Smith Jr., Deputy Solicitor General

T. Parkin Hunter, Senior Assistant Attorney General

Michael S. Traynham, Assistant General Counsel

S.C. Department of Health and Environmental Control

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