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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Administrative Law Judge

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Case No. 15-ALJ-07-0404-CC

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DEC 01 2016  
SC Court of Appeals

South Carolina Department of Health and Environmental Control  
and Horry County Public Works  
.....Respondents,

vs.

South Carolina Coastal Conservation League and South Carolina  
Wildlife  
Federation.....Appellants.

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HORRY COUNTY PUBLIC WORKS' MOTION FOR EXTENSION OF TIME  
FOR FILING INITIAL BRIEF AND DESIGNATION OF MATTER OF  
RESPONDENTS AND FOR LEAVE TO EXCEED THE INITIAL BRIEF PAGE  
LIMIT

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TO: ALL PARTIES AND THE COURT OF APPEALS:

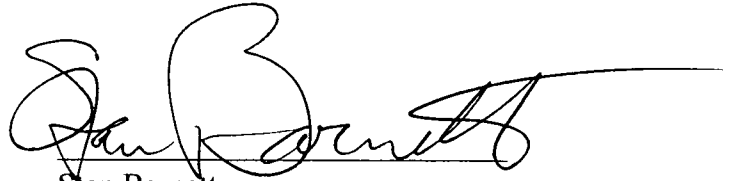
PLEASE TAKE NOTICE that Respondent, Horry County Public Works hereby moves the Court of Appeals for an Order extending the time for filing the Initial Brief of Respondents and Designation of Matter until January 25, 2017. Appellants and Counsel for S.C. Department of Health and Environmental Control have consented to this request.

The reason for the request for more time is that, after being granted two extensions to file their Initial Brief without objection from either Respondent, Appellants filed their brief on November 23, 2016. This would require Respondents to file their brief on December 23, 2016. Counsel for Horry County did not receive the brief until November 28, 2016 due to the Thanksgiving Holiday and a relocation of office. This is not the fault of Appellants. The timing does, however, require, without an extension, Respondents to work through most of the Christmas Holidays.

The reason for the request for leave to file a brief longer than that allowed by the Rules is that Appellants have filed a brief sixty pages long and asked for permission, without objection from Respondents, to file the longer brief. Respondents do not agree with Appellants that the issues in this case are overly complex, but out of an abundance of caution given their considerably longer brief, Respondents believe to insure their ability to adequately address that brief, they need to make this request.

WHEREFORE, the Respondent, Horry County Public Works, respectfully requests: 1) that the Court of Appeals enter an order extending the time for filing the Respondents' Initial Brief and Designation of Matter until January 25, 2017; and 2) grant Respondents leave to file a brief longer than that provided by the Rules, up to the length of Appellants' brief, sixty pages.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stan Barnett", with a long horizontal flourish extending to the right.

Stan Barnett  
305 North Civitas Street  
Mount Pleasant, South Carolina 29464  
(843) 884-1031/ (843) 708-4887  
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Attorney for Respondent,  
Horry County Public Works

November 30, 2016  
Mount Pleasant, South Carolina

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Administrative Law Judge

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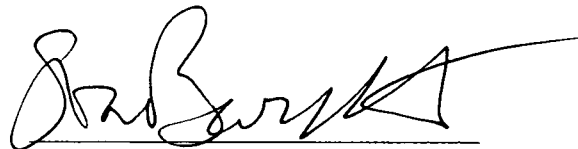
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I hereby certify that on this date I served the forgoing  
Motion for Extension of Time for Filing Initial Brief and  
Designation of Matter of Respondents and for Leave to Exceed the  
Initial Brief Page Limit by placing copies of same in the U.S. Mail  
addressed to:

Amy E. Armstrong, Esq.  
S.C. Environmental Law Project  
P.O. Box 1380  
Pawleys Island, S.C. 29585

Michael S. Traynham, Esq.  
SCDHEC  
2600 Bull Stree  
Columbia, S.C. 29101

Nathan M. Haber, Esq.  
SCDHEC/OCRM  
1362 McMillan Avenue, Suite 400  
Charleston, S.C. 29405

A handwritten signature in black ink, appearing to read 'Stan Barnett', written over a horizontal line.

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Attorney for Respondent,  
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November 30, 2016  
Mount Pleasant, South Carolina

STAN BARNETT  
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305 North Civitas Street  
Mount Pleasant, South Carolina 29464

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SC Court of Appeals

November 30, 2016

The Honorable Jenny Abbott Kitchings  
Clerk, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

RE: S.C. DHEC and Horry County Public Works v. SC Coastal Conservation League and SC  
Wildlife Federation  
Admin Law Court Case No. 15-ALJ-07-0404-CC

Dear Ms Kitchings:

Enclosed please find an original and seven copies of Respondent Horry County's Motion  
for Extension of Time for Filing Initial Brief and Designation of Matter of Respondents and for  
Leave to Exceed the Initial Brief Page Limit in the above styled appeal.

Please return a clocked copy in the enclosed stamped envelope.

With kindest regards and appreciation, I remain

Sincerely,



Stan Barnett

Cc: Amy E. Armstrong, Esq.  
Michael Traynham, Esq.  
Nathan Haber, Esq.  
Arrigo Carotti, Esq.



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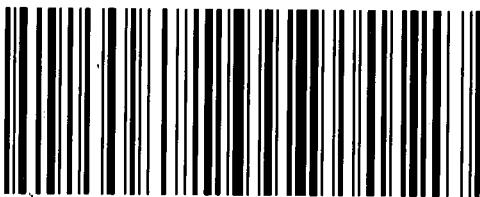
SC Court of Appeals

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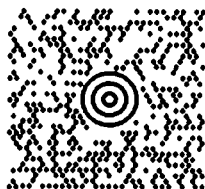


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STAN BARNETT

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And by electronic documents