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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Administrative Law Judge

**RECEIVED**

Appellate Case No. 2016-001758

FEB 03 2017  
SC Court of Appeals

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

vs.

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

**MOTION FOR EXTENSION OF TIME**

TO: ALL PARTIES AND THE COURT OF APPEALS:

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 February 2, 2017, and the Appellants request an extension of ten (10) days, until February 13, 2017. The basis of this motion is as follows:


Due to existing commitments and deadlines with 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. Counsel for the Appellants received the Respondents' joint Initial Brief on January 17<sup>th</sup>, as it was not emailed, and the mail was delayed over the holiday weekend. At that time counsel was preparing a response to the motion to vacate under the expedited schedule imposed by this Court. Following the Court's Order granting Respondents' motion to vacate,

council prepared a motion for reconsideration and our reply deadline on that motion is also February 2, 2017. Counsel has also been preparing for an upcoming trial, including reviewing thousands of pages of discovery and preparing for depositions.

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 Respondents who consent to this motion.

WHEREFORE, the Appellants respectfully request that the Court enter an order extending the time for filing their Initial Reply Brief until February 13, 2017. Appellants further request that this Court hold deadlines in abeyance while considering this motion.



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February 1, 2017

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date I served Respondents Horry County Public Works and  
SCDHEC with Appellants' Motion for Extension by placing copies of same in the U.S. Mail addressed  
to:

Stan Barnett, Esquire  
305 Noth Civitas Street  
Mt. Pleasant, SC 29464

Nathan Haber, Esquire  
DHEC/OCRM  
1362 McMillan Avenue, Suite 400  
Charleston, SC 29405

Michael Traynham, Esquire  
DHEC Office of Counsel  
2600 Bull Street  
Columbia, SC 29201



Amelia Thompson

Georgetown, South Carolina

February 1, 2017



# South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

February 1, 2017

α:501c3  
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Honorable Jenny Abbott Kitchings  
Clerk, S. C. Court of Appeals  
P. O. Box 11629  
Columbia, S. C. 29211

RE: SC Coastal Conservation League and SC Wildlife  
Federation v. SCDHEC and Horry County Public  
Works  
Appellate Case No. 2016-001758

Dear Ms. Kitchings:

Enclosed for filing, please find the original and seven (7)  
copies of the Appellants' Motion for Extension of Time, along  
with my certificate of service and filing fee.

Please return a clocked-in copy in the enclosed, postage-  
paid envelope. Thank you for your assistance.

Yours very truly,

Amelia A. Thompson

cc: Stan Barnett, Esq.  
Michael Traynam, Esq.  
Nathan Haber, Esq.

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FEB 03 2017

SC Court of Appeals

S.C. Environmental Law Project  
PO Box 1380  
Pawleys Island, SC 29585



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