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S.C. SUPREME COURT

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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

Kiawah Development Partners, II, Respondent,

v.

South Carolina Department of Health and Environmental Control, Appellant.

and

South Carolina Coastal Conservation League, Appellant,

v.

South Carolina Department of Health and Environmental Control and Kiawah Development Partners, II, of whom South Carolina Department of Health and Environmental Control is, Appellant, and Kiawah Development Partners is, Respondent.

**COASTAL CONSERVATION LEAGUE'S MOTION FOR
EXTENSION OF TIME FOR FILING INITIAL REPLY BRIEF**

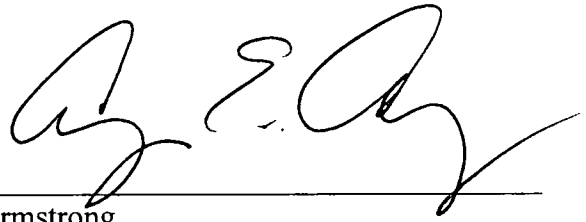
TO: ALL PARTIES AND THE SUPREME COURT:

PLEASE TAKE NOTICE that the Appellant South Carolina Coastal Conservation League ("League") hereby moves the Supreme Court for an Order extending the time for filing its Initial Reply Brief. The Reply Brief is currently due on March 20 and the League seeks an extension of ten (10) days, until March 30, 2017. South Carolina Department of Health and Environmental Control and Kiawah Development Partners, II, consent to this motion, which is the League's second and final request for an extension. The basis of this motion is as follows:

Counsel for the Coastal Conservation League has made progress on its reply brief since the last extension request was granted, but has been unable to complete the brief and coordinate its review by co-counsel. Lead counsel runs a small public interest law firm and has had multiple competing demands over the past two weeks, which prevented her from focusing the time and attention necessary to compete the reply brief in this case. In particular, counsel had a reply brief due in the Fourth Circuit Court of Appeals on March 7 and oral arguments in the S.C. Court of Appeals on March 8. Those obligations prevented counsel from spending the necessary time to prepare the reply brief until March 9; however, the following week of March 13, one of counsel's colleagues was out of the office at an out-of-state CLE, which left lead counsel having to cover that attorney's responsibilities. Due to these additional responsibilities, and other competing demands, counsel has been unable to focus the time and effort necessary to sufficiently prepare the League's reply brief. For that reason, the League respectfully requests a ten (10) day extension so that the reply brief is due on March 30.

Counsel for the Appellant Coastal Conservation League has consulted with counsel for DHEC and for the Respondent Kiawah Development Partners, II, Inc., both of whom consent to this motion.

WHEREFORE, the Coastal Conservation League requests that this Court issue an order extending the time to file their reply brief under March 30, 2017. The Appellant further requests that the briefing deadline be held in abeyance pending a decision on this motion.



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PROJECT

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March 20, 2017

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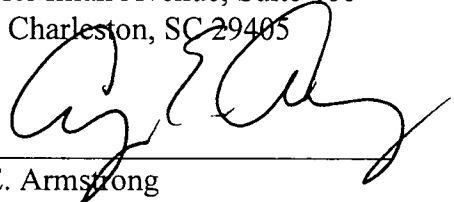
South Carolina Department of Health and Environmental Control and Kiawah Development Partners, II, of whom South Carolina Department of Health and Environmental Control is, Appellant, and Kiawah Development Partners is, Respondent.

CERTIFICATE OF SERVICE

I hereby certify that on this date I served the Appellant Coastal Conservation League's Motion for Extension of Time for Filing Initial Reply Brief on Kiawah Development Partners II, Inc., and DHEC, by placing copies of the foregoing in the U.S. Mail addressed to:

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March 20, 2017