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THE STATE OF SOUTH CAROLINA
In The Administrative Law Court

APPEAL FROM S. C. DEPARTMENT OF HEALTH & ENVIORN. CONTROL
Office of Coastal Resources

Catherine E. Heigel, Director

Appellate Case Number: 2017-000161
Case No. 2015-RFR-69, Sunset Cay, L.L.C.
DOCKET NO. 15-ALJ-07-0579-CC

RECEIVED
AUG 21 2017
SC Court of Appeals

Sunset Cay, L.L.C., Appellant,

vs.

S. C. Dept. of Health and Enviorn. Control, Division of O.C.R.M., Respondent.

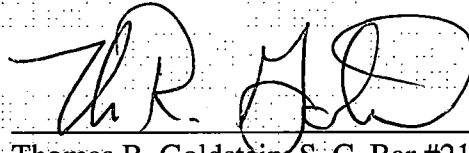
MOTION FOR 30 DAY EXTENSION FOR REPLY BRIEF

The Appellant moves for an order of the Court granting a thirty (30) day extension to file its reply brief. This motion is based on the following grounds:

1. The appellant received the respondent's brief on Wednesday, August 9, and the appellant's reply brief is due Thursday August 17th.
2. Appellant's counsel has been involved in a real estate closing on Friday, August 11th, which occurred out of town, and has a proposed Order due to the circuit court on Friday August 18th following a trial on the merits of another case.
3. Appellant's counsel has had long standing plans to be out of town on a planned vacation for the weeks of August 21st and August 28th. (See attached Order of Protection.) Appellant's counsel has a heavy workload compounded by the fact that appellant's counsel must make extensive preparations to leave on vacation, and will encounter a crush of work on return from vacation. A normal ten-day extension would make the brief due in the middle of appellant's counsel's planned vacation.

4. Appellant's counsel has not taken an extended absence from the office in over 15 years and would like an opportunity to be out of the office without working on vacation.

For these reasons, appellant requests a thirty day extension to file a reply brief.



August 16, 2017

Thomas R. Goldstein, S. C. Bar #2186
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CERTIFICATE OF CONSULTATION

I certify that prior to filing this request, I consulted with opposing counsel who does not object to the request.



August 16, 2017

Thomas R. Goldstein, S. C. Bar #2186
Belk, Cobb, Infinger & Goldstein, P.A.

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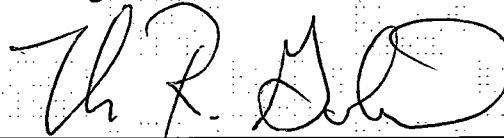
vs.

S. C. Dept. of Health and Enviorn. Control, Division of O.C.R.M., Respondent.

CERTIFICATE OF SERVICE

The undersigned hereby certified that it served a true copy of the appellant's Motion for 30-day Extension upon respondent by serving a copy upon respondent's counsel of record, Bradley Churdar, General Counsel, Office of Coast Resources Management, 1362 McMillan Avenue, Suite 400, N. Charleston, S. C. 29405-2047, by mailing a copy of each properly addressed with sufficient postage affixed thereto this 16th day of August, 2017.

August 16, 2017



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E-mail: tgoldstein@cobblaw.net

STATE OF SOUTH CAROLINA)
COUNTY OF CHARLESTON)

IN RE:)
THOMAS R. GOLDSTEIN)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT


ORDER OF PROTECTION

FILED
2017 JUN 20 PM 4:47
JULIE J. AMOS, CLERK
COURT CLERK
BY _____

IT APPEARING that Thomas R. Goldstein has a planned vacation for August 21-September 1, 2017,

IT IS, THEREFORE, ORDERED, that Thomas R. Goldstein be protected for the terms of court relating to the date above.

IT IS SO ORDERED!



Chief Administrative Judge
Ninth Judicial Circuit

Charleston, South Carolina

June 20, 2017

BELK, COBB, INFINGER AND GOLDSTEIN, P.A.

Harry C. Belk (1919-2003)

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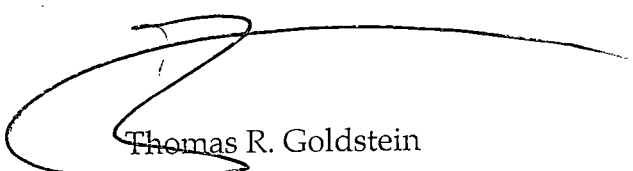
Hon. Jenny Abbott Kitchings
Clerk of Court,
South Carolina Court of Appeals
P. O. Box 11629
Columbia, S. C. 29211

Re: Sunset Cay, LLC vs. SCDHEC, Division of OCRM
Appellate Case Number: 2017-000161

Dear Ms. Kitchings,

I enclose an original and seven copies of the Appellant's Motion for Extension for Reply Brief along with our firm's check for the filing fee in the amount of \$25.00. I ask that you please file the original with the court and return a filed copy to me in the envelope provided. By copy of this letter to Bradley Churdar, I am serving a copy of the Motion for Extension upon opposing counsel. With kind regards, I am

Very truly yours,
BELK, COBB, INFINGER & GOLDSTEIN, P.A.



Thomas R. Goldstein

TRG/ral

enclosure: Motion for Extension, return envelope, check #17962

cc: Bradley Churdar, Esq.
Butch Clark

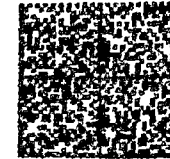
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SC Court of Appeals



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