

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Deborah B. Durden, Administrative Law Judge

Appellate Case No. 2017-001977

RECEIVED
NOV 30 2017
SC Court of Appeals

South Carolina Coastal Conservation League,

Appellants,

vs.

South Carolina Department of Health and Environmental Control and
DBBO, LLC,

Respondents.

**MOTION FOR EXTENSION OF TIME
FOR FILING INITIAL BRIEF AND DESIGNATION OF MATTER
OF APPELLANTS**

TO: ALL PARTIES AND THE COURT OF APPEALS:

PLEASE TAKE NOTICE that the Appellants South Carolina Coastal Conservation League (the "League") hereby moves the Court of Appeals for an Order extending the time for filing their Initial Brief and Designation in the above-captioned matter. The Initial Brief and Designation are due on November 28, 2017, and Appellants seek an extension of thirty (30) days, until December 28, 2017. This is the second request for an extension.

Counsel for the League has not had sufficient time or resources to adequately prepare the brief and designation in this case. Counsel is a small public interest firm that maintains a heavy and active caseload. While progress has been made, counsel's office was closed for several days

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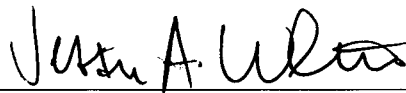
to accommodate holiday schedules and travel and has had a competing deadline for briefing with this Court in an unrelated matter that has prevented her from dedicating the time necessary to thoroughly brief the issues involved here. Additionally, over the next several weeks counsel for the League has numerous other briefing and court deadlines, as well as out-of-the office commitments, including filings in this Court, circuit court and the Administrative Law Court.

Therefore, the League respectfully moves for an extension of time for the filing of their brief and designation in the above-captioned matter.

Counsel for the League has consulted with counsel for Respondents SCDHEC and DBBO, LLC, both of whom consent to this requested extension.

WHEREFORE, the Appellants request that the Court of Appeals enter an order extending the time for filing their Initial Brief and Designation of Matter until December 28, 2017.

Respectfully submitted,



Amy E. Armstrong
Jessie A. White
SOUTH CAROLINA ENVIRONMENTAL LAW
PROJECT

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Counsel for Appellants

Georgetown, South Carolina

November 28, 2017

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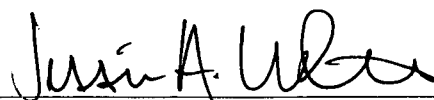
Respondents.

CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing Motion for Extension on Respondents SCDHEC and DBBO by placing copies of same in the U.S. Mail addressed to:

Mary D. Shahid
Angelica M. Colwell
Nexsen Pruet, LLC
P.O. Box 486
Charleston, SC 29402

Bradley D. Churdar
SCDHEC/OCRM
1362 McMillan Avenue, Suite 400
Charleston, SC 29405



Jessie A. White

Georgetown, South Carolina
November 28, 2017



South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

a 501c3
non-profit organization

November 28, 2017

Amy E. Armstrong
Executive Director
Michael G. Corley
Staff Attorney
Amelia A. Thompson
Staff Attorney
Jessie A. White
Staff Attorney

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

MAIN OFFICE
430 Highmarket Street
Georgetown, SC 29440

Re: SC Coastal Conservation League v. SCDHEC and DBBO;
Appellate Case No. 2017-001977

MAILING ADDRESSES
P.O. Box 1380
Pawleys Island, SC 29585

Dear Ms. Kitchings:

P.O. Box 5761
Greenville, SC 29606

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

(843) 527-0078
(864) 412-7921
Fax (843) 527-0540
E-mail: amy@scejp.org
michael@scejp.org
amelia@scejp.org
jessie@scejp.org

Please return a clocked-in copy in the self-addressed, stamped envelope provided.

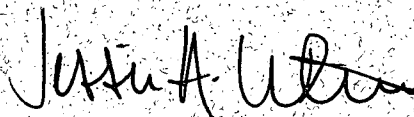
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Thank you very much for your kind cooperation and assistance.

Greg VanDerwerker, MD
Chairperson

Yours very truly,

John Barton, Esq.
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Frances Close
John Mark Dean, PhD
Paula Feldman, PhD
Allen Grumbine, Esq.
Susan Hilfer
Gary W. Poliakoff, Esq.
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Wendy Zara


Jessie A. White

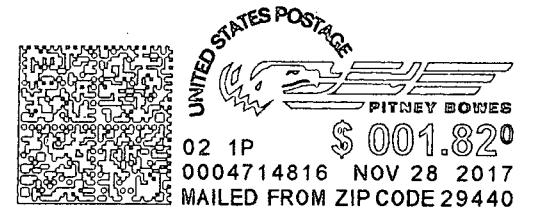
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SC Court of Appeals

SC Environmental
Law Project
PO Box 1380
Pawleys Island, SC 29585



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SC Court of Appeals

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

