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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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JAN 05 2018
SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Deborah B. Durden, Administrative Law Judge

Appellate Case No. 2017-001977

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 Appellant 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 January 2, 2018, and Appellant seeks an extension of thirty (30) days, until February 1, 2018. This is the third 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. Lead counsel runs a small public interest firm that maintains a heavy and active caseload, which has included multiple briefing deadlines before this Court and

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the S.C. Supreme Court in November and December. Also in December, counsel had a long-standing commitment to attend a three day out-of-town conference from December 4-6. Finally, counsel is responsible for planning and coordinating the Environment and Natural Resource/Administrative Law Section Program at the upcoming Bar Convention in Kiawah to be held January 18-21, which has likewise diverted time from preparation of the brief.

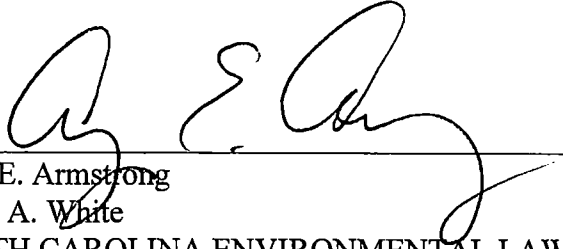
Over the holidays, the firm's office was closed for a total of four days, during which counsel traveled to spend time with her immediate family. In addition, two of the firm's six employees took extra vacation days around the holidays, placing additional burdens on counsel to compensate for the absence of co-workers. Then, immediately following the holiday, counsel became ill and unable to commit any time to the brief for four days.

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 Respondent DBBO, LLC, who consents to this motion. Counsel for the League has attempted to contact counsel for Respondent SCDHEC, and anticipates consent, but has been unable to confirm whether SCDHEC consents to this requested extension as of the time of filing.

WHEREFORE, the Appellant requests that the Court of Appeals enter an order extending the time for filing their Initial Brief and Designation of Matter until February 1, 2018.

Respectfully submitted,



Amy E. Armstrong

Jessie A. White

SOUTH CAROLINA ENVIRONMENTAL LAW
PROJECT

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Counsel for Appellant

Georgetown, South Carolina

January 1, 2018

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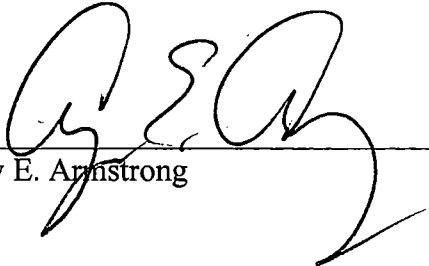
Respondents.

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



Amy E. Armstrong

Georgetown, South Carolina
January 2, 2018



South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

a 501c3
non-profit organization

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January 2, 2018

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SC Court of Appeals

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

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

Dear Ms. Kitchings:

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

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

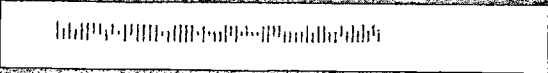
Thank you very much for your kind cooperation and assistance.

Yours very truly,


Amy E. Armstrong

cc: Mary D. Shahid
Angelica M. Colwell
Bradley D. Churdar

SOUTH CAROLINA ENVIRONMENTAL LAW PROJECT
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The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
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Columbia, SC 29211