

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

John D. McLeod, Administrative Law Judge

Case No. 09-ALJ-07-0069-CC

RECEIVED
FEB 07 2018
SC Court of Appeals

Town of Arcadia Lakes, Robert L. Jackson, Linda Z. Jackson, Robert E. Williams, Barbara S. Williams, Elizabeth M. Walker, Louis E. Spradlin, Mary Helen Spradlin, Thomas Hutto Utsey, Tony Sinclair, Aaron Small, Bette Small, Gene F. Starr, M.D., Elaine J. Starr, Sanford T. Marcus, Ruth L. Marcus, and Steven Brown. Petitioners,

Of Which Town of Arcadia Lakes is Appellant/Respondent,

v.

South Carolina Department of Health and Environmental Control. Respondents,

and

Roper Pond, LLC Respondent/Appellant.

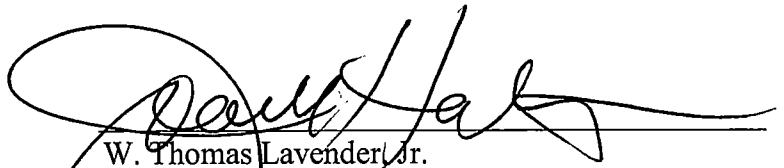
JOINT MOTION FOR EXTENSION OF TIME

Pursuant to Rules 240 and 263(b), SCACR, Appellant/Respondent Town of Arcadia Lakes ("Town") and Respondent/Appellant Roper Pond, LLC ("Roper Pond") hereby jointly move the Court for an Order extending the time for filing Initial Reply Briefs. Pursuant to Rule 208, SCACR, the deadline for filing the Initial Reply Briefs is February 8, 2018. The parties request a twenty (20) day extension of the filing deadline to February 28, 2018. This is the first request for an extension of this deadline. The grounds for this motion are that Counsel for the

Town and Counsel for Roper Pond have had multiple filing deadlines, and both will be traveling over the next two weeks.

WHEREFORE, the Town and Roper Pond respectfully request that the Court enter an order extending the deadline for filing Initial Reply Briefs to February 28, 2018. The parties further request that the Court hold the present filing deadline in abeyance while considering this motion.

February 7, 2018



W. Thomas Lavender, Jr.
Joan W. Hartley
NEXSEN FRUET, LLC
1230 Main Street, Suite 700 (29201)
Post Office Drawer 2426
Columbia, SC 29202
803.771.8900

Attorneys for Respondent/Appellant
Roper Pond, LLC

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Of Which Town of Arcadia Lakes is Appellant/Respondent,

v.

South Carolina Department of Health and Environmental Control. Respondents,

and

Roper Pond, LLC Respondent/Appellant.

PROOF OF SERVICE

I certify that I have served the **Joint Motion for Extension of Time** on counsel of record for South Carolina Environmental Law Project and South Carolina Department of Health and Environmental Control by depositing a copy of it in the United States Mail, postage prepaid, on February 7, 2018, addressed to:

Stephen P. Hightower, Esquire
Office of General Counsel
South Carolina Department of Health
and Environmental Control
2600 Bull Street
Columbia, SC 29201

Amy E. Armstrong, Esquire
South Carolina Environmental Law
Post Office Box 1380
Pawleys Island, SC 29585
430 Highmarket Street
Georgetown, SC 29440

Terry E. Richardson, Jr., Esquire
Richardson Patrick Westbrook & Brickman, LLC
Post Office Box 1368
Barnwell, SC 29812

A handwritten signature in black ink, appearing to read "W. Thomas Lavender, Jr.", written over a horizontal line.

W. Thomas Lavender, Jr. (SC Bar No. 3143)
Joan W. Hartley (SC Bar No. 72735)
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Attorneys for Respondent-Appellant Roper Pond, LLC

Joan W. Hartley
Special Counsel
Admitted in SC, NC

February 7, 2018

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HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

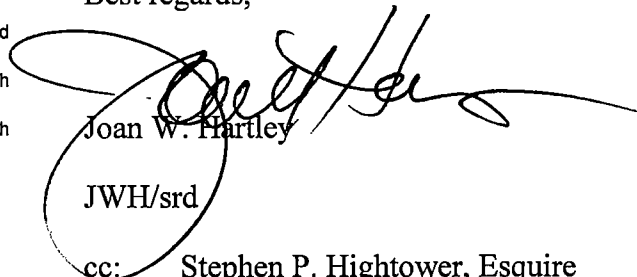
Re: *Town of Arcadia Lakes, et al. v. South Carolina Department of Health and
Environmental Control and Roper Pond, LLC*
Docket No. 09-ALC-07-0069-CC
Appellate Case No. 2017-001554

Dear Ms. Kitchings:

Enclosed for filing is an original and seven copies of a Joint Motion for Extension of Time in the above-referenced matter. Also enclosed is our firm's check in the amount of \$25 for the filing fee. Please return a clocked copy to us via our courier.

We appreciate your assistance in this matter.

Best regards,



Joan W. Hartley

JWH/srd

cc: Stephen P. Hightower, Esquire
Amy E. Armstrong, Esquire
Terry E. Richardson, Jr., Esquire

- Charleston
- Charlotte
- Columbia**
- Greensboro
- Greenville
- Hilton Head
- Myrtle Beach
- Raleigh

✓