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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Deborah B. Durden, Administrative Law Judge

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MAR 08 2018

SC Court of Appeals

Appellate Case No. 2017-001977

South Carolina Coastal Conservation League,

Appellant,

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 APPELLANT**

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 its Initial Brief and Designation in the above-captioned matter. The Initial Brief and Designation are due on March 5, 2018, and Appellant seeks an extension of seven (7) days, until March 12, 2018. This is the fifth request for an extension.

Counsel for the League has made significant progress on the initial brief since the last extension, and counsel does not make this final request lightly. However, counsel has had multiple competing demands on her time, both personal and professional, over the past several

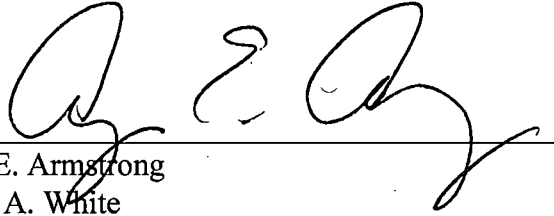
weeks, including briefing deadlines and out-of-office commitments. While counsel recognizes that on-going case loads are not extraordinary in and of themselves, the volume and nature of counsel's cases at present is extraordinary. Nonetheless, counsel has committed a significant amount of time to preparing the initial brief, and the draft currently stands at 60 pages. Clearly, the brief needs to be refined, focused, and shortened to meet the Appellate Court Rules. Counsel is confident that an additional week would provide her the time needed to illuminate the issues before this Court in a manner that reflects zealous representation of her client's interests.

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 DBBO, LLC and SCDHEC. Counsel for Respondent DHEC consents to this motion. Counsel the League has not heard whether counsel for Respondent DBBO consent; however DBBO has consented to previous motions for extensions and due to the limited one week request, counsel anticipates consent from DBBO will be forthcoming.

WHEREFORE, the Appellant requests that the Court of Appeals enter an order extending the time for filing their Initial Brief and Designation of Matter one week until March 12, 2018.

Respectfully submitted,



Amy E. Armstrong

Jessie A. White

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March 5, 2018

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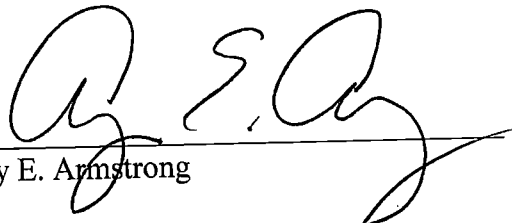
Respondents.

**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

March 5, 2018



# The South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

March 5, 2018

501(c)(3)  
non-profit organization

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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, seeking an additional one week to file its initial brief.

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,

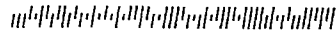
  
Amy E. Armstrong

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

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SC Court of Appeals



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Pawleys Island, SC 29585*



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