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November 27, 2018

**VIA HAND DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, South Carolina 29201

**RECEIVED**

NOV 27 2018

S.C. SUPREME COURT

RE: *Preservation Society of Charleston. v. SCDHEC*  
Appellate Case No. 2018-000137

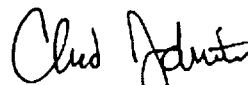
Dear Mr. Shearouse:

Enclosed for filing, please find the original and one (1) copy of the **Initial Brief of Respondent South Carolina Ports Authority** in the above-captioned matter. A proof of service of same on Petitioners and co-Respondent South Carolina Department of Health and Environmental Control is also enclosed. I would appreciate your acknowledging receipt by file stamping the enclosed extra copy and returning it to me via our courier.

If you have any questions or need additional information, please do not hesitate to contact me at your convenience. With best regards, I am

Respectfully,

**WILLOUGHBY & HOEFER, P.A.**

  
Chad N. Johnston

Enclosures

The Honorable Daniel E. Shearouse

November 27, 2018

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cc: Amy E. Armstrong, Esquire (via U.S. Mail with enclosures)  
Jessie A. White, Esquire (via U.S. Mail with enclosures)  
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THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM THE ADMINISRATIVE LAW COURT  
Ralph K. Anderson, III, Chief Administrative Law Judge  
Case No. 13-ALJ-07-0056-CC

**RECEIVED**

NOV 27 2018

Appellate Case No. 2018-000137

S.C. SUPREME COURT

Preservation Society of Charleston,  
Historic Charleston Foundation, Historic  
Ansonborough Neighborhood Association,  
South Carolina Coastal Conservation  
League, Charlestowne Neighborhood  
Association, Charleston Chapter of the  
Surfrider Foundation, and Charleston  
Communities for Cruise Control,..... Petitioners,

v.

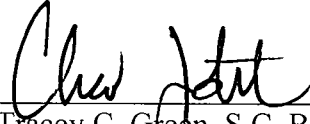
South Carolina Department of Health and  
Environmental Control and South Carolina  
State Ports Authority,..... Respondents.

**CERTIFICATE OF COUNSEL**

The undersigned hereby certifies that the Brief of Respondent South Carolina Ports  
Authority complies with Rule 211(b), SCACR.

[SIGNATURE PAGE FOLLOWS]

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Ports Authority*

November 27, 2018  
Columbia, South Carolina