

STATE OF SOUTH CAROLINA  
IN THE  
SUPREME COURT

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MAY 06 2019

S.C. SUPREME COURT

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Appeal from the Administrative Law Court  
Honorable Ralph King Anderson, III, Administrative Law Judge  
Case No. 04-ALC-07-0126-CC  
Appellate Case No. 2015-001915

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*South Carolina Court of Appeals*  
414 S.C. 581, 779 S.E.2d 805 (Ct. App. 2015)

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Sierra Club,

Respondent,

v.

South Carolina Department of Health and  
Environmental Control and Chem-Nuclear  
Systems, LLC,

Defendants,

Of whom Chem-Nuclear Systems, LLC, is the

Petitioner.

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**MOTION FOR EXTENSION OF TIME TO FILE A RETURN  
TO RESPONDENT'S MOTION FOR COSTS**

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David J. Parrish, Esquire  
Mary D. Shahid, Esquire  
Sara S. Rogers, Esquire  
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*Attorneys for Petitioner Chem-Nuclear Systems, LLC*

TO: THE HONORABLE JUSTICES OF THE SOUTH CAROLINA SUPREME COURT:


COMES NOW the Petitioner, Chem-Nuclear Systems, LLC ("Chem-Nuclear"), pursuant to Rules 240 and 242(j), SCACR, and respectfully requests this Court grant it a fifteen (15) day extension of time to file a return to Respondent's motion for attorney's fees and costs on appeal.

The basis for this motion is that counsel for Chem-Nuclear needs additional time to evaluate and respond to Respondent's motion in light of the decision of this Court, which affirmed in part as modified, reversed in part, and remanded this matter for further proceedings.

Chem-Nuclear also respectfully requests this Court hold the motion return time in abeyance until such time as this motion may be considered and ruled upon.

Respectfully submitted:

*NEXSEN PRUET, LLC*

By: 

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Charleston, South Carolina  
May 6, 2019

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PROOF OF SERVICE FOR  
MOTION FOR EXTENSION OF TIME TO FILE A RETURN TO  
RESPONDENT'S MOTION FOR COSTS

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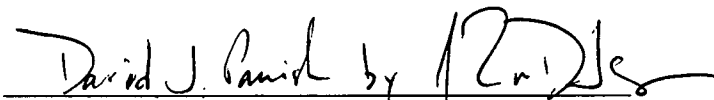
I, David J. Parrish, Esquire, hereby certify that on May 6, 2019, I served a copy of the MOTION FOR EXTENSION OF TIME TO FILE A RETURN TO RESPONDENT'S MOTION FOR COSTS submitted on behalf of the Petitioner Chem-Nuclear Systems, LLC on all counsel of record herein via United States Mail, postage pre-paid, and addressed as follows:

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Michael G. Corley, Esquire  
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David J. Parrish, Esquire

Charleston, South Carolina  
May 6, 2019