

**Benjamin P. Mustian, Esq.**

BPM Law Firm, LLC

Tel: (803) 608-3804  
bpmlawsc@gmail.com

141 Pelham Drive, Suite F #108  
Columbia, SC 29209

September 3, 2019

**RECEIVED**

SEP 05 2019

SC Court of Appeals

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: *Charles S. Blackmon v. SCDHEC*; Appellate Case No. 2017-002598

Dear Ms. Kitchings:

I am writing to advise the Court that I am no longer with the law firm of Willoughby & Hoefler, P.A. However, I will continue to serve as co-counsel for Respondents David Coggins Broilers, Heath Coggins Broilers, and Jim Young Broilers in the above-referenced matter along with Mitchell Willoughby, Esquire and Tracey C. Green, Esquire of Willoughby & Hoefler, P.A., both of whom are currently listed as counsel of record to this appeal. I would respectfully request that the Court update its file to reflect that my current contact information is as follows:

Benjamin P. Mustian, Esq.  
141 Pelham Drive, Suite F #108  
Columbia, South Carolina 29209  
Tel: (803) 608-3804  
Email: bpmlawsc@gmail.com

Any future correspondence regarding this matter should be sent to me at the address identified above as well as to Mr. Green and Mr. Willoughby at the address identified below:

Mitchell Willoughby, Esq.  
Tracey C. Green, Esq.  
Willoughby & Hoefler, P.A.  
Post Office Box 8416  
Columbia, South Carolina 29202-8416  
Tel: (803) 252-3300  
Email: mwilloughby@willoughbyhoefler.com  
tgreen@willoughbyhoefler.com

The Honorable Jenny Abbott Kitchings

September 3, 2019

Page 2 of 2

---

By copy of this letter, I am serving a copy of this letter on all parties of record and enclose a Proof of Service to that effect. If you have any questions, or need additional information, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'B. Mustian', with a long horizontal flourish extending to the right.

Benjamin P. Mustian

cc: All Parties of Record  
(via first class mail)

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Chief Administrative Law Judge

Appellate Case No. 2017-002598

**RECEIVED**  
SEP 05 2019  
SC Court of Appeals

ALC Case Nos. 17-ALJ-07-0041-CC; 17-ALJ-07-0042-CC; 17-ALJ-07-0039-CC

Charles S. Blackmon and South Carolinians for  
Responsible Agricultural Practices,.....Appellants,

v.

South Carolina Department of Health and Environmental  
Control and David Coggins Broilers, ..... Respondents;

Charles S. Blackmon and South Carolinians for  
Responsible Agricultural Practices,.....Appellants,

v.

South Carolina Department of Health and Environmental  
Control and Heath Coggins Broilers, ..... Respondents;

Charles S. Blackmon and South Carolinians for  
Responsible Agricultural Practices,.....Appellants,

v.

South Carolina Department of Health and Environmental  
Control and Jim Young Broilers, ..... Respondents.

**PROOF OF SERVICE**

This is to certify that, on behalf of Respondents David Coggins Broilers, Heath Coggins

Broilers, and Jim Young Broilers, I have caused to be served this day one (1) copy of a letter dated September 3, 2019, to the Honorable Jenny Abbott Kitchings via the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

Robert Guild, Esquire  
314 Pall Mall Street  
Columbia, South Carolina 29201

Stephen P. Hightower, Esquire  
Michael Smoak Traynham, Esquire  
S.C. Department of Health and Environmental Control  
Office of General Counsel  
2600 Bull Street  
Columbia, South Carolina 29201

Mitchell Willoughby, Esquire  
Tracey C. Green, Esquire  
Willoughby & Hoefler, P.A.  
Post Office Box 8416  
Columbia, South Carolina 29202-8416



Benjamin P. Mustian

Columbia, South Carolina  
This 3<sup>rd</sup> day of September, 2019.

Benjamin P. Mustian  
BPM Law Firm, LLC  
141 Pelham Drive, Suite F #108  
Columbia, South Carolina 29209

COLUMBIA, SC 290

04 SEP 2019 PM 3 L



**RECEIVED**

SEP 05 2019

**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of Court, Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

29201-376999

