

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Ralph King Anderson, III, Administrative Law Judge S.C. SUPREME COURT

Appellate Case No. 2019-000074

South Carolina Coastal Conservation League ..... Appellant,

v.

South Carolina Department of Health and Environmental Control, KDP II, LLC,  
and KRA Development, LP, ..... Respondents.

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**MOTION FOR EXTENSION OF TIME FOR FILING  
APPELLANT’S INITIAL REPLY BRIEF**

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TO: ALL PARTIES AND THE SOUTH CAROLINA SUPREME COURT:

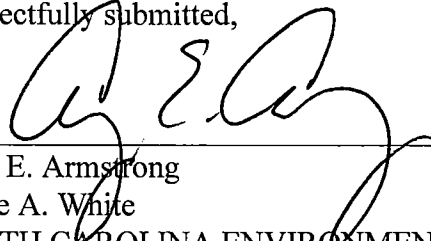
PLEASE TAKE NOTICE that the Appellant South Carolina Coastal Conservation League (“League”) hereby moves the Supreme Court to extend the time for filing its initial reply brief to Respondents KDP II, LLC, and KRA Development, LP, and the South Carolina Department of Health and Environmental Control’s (“DHEC”) initial briefs. Presently the League’s reply brief is due December 12, 2019, and a 10-day extension would allow the League to file its reply brief on December 23, 2019. This is the League’s second requested extension. Counsel for the Appellant Coastal Conservation League consulted with counsel for Respondents KDP II, LLC, and KRA Development, LP, and DHEC, both of whom consent to this motion.

The basis of this motion is as follows:

The undersigned is lead counsel for the League in this matter. Counsel has had an unanticipated and ongoing personal situation arise nearly five weeks ago that has placed, and will continue to place, significant time and energy demands on her, and greatly diminished counsel's ability to commit time and energy to her existing work load, most particularly to this matter. Counsel has largely been able to manage existing legal obligations, but the situation has forced her to restrict and minimize personal and work-related responsibilities and plans, including canceling Thanksgiving family travel plans. As a consequence, counsel has not be able to dedicate the resources necessary to fully prepare its reply brief for filing.

WHEREFORE, the Coastal Conservation League requests that this Court issue an order extending the League's reply brief deadline until December 28, 2019.

Respectfully submitted,



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PROJECT

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Conservation League

Georgetown, South Carolina

December 11, 2019

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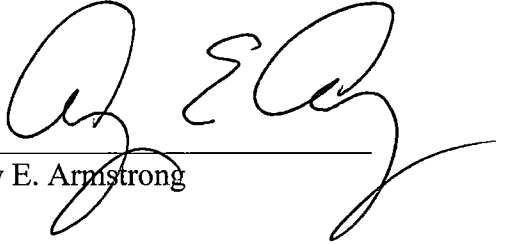
**CERTIFICATE OF SERVICE**

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I hereby certify that on this date I served the foregoing Motion for Extension for filing Appellant's Initial Reply Brief on all parties by placing copies of same in the U.S. Mail addressed to:

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Amy E. Armstrong

Georgetown, South Carolina

December 11, 2019