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DEC 30 2019

S.C. SUPREME COURT

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

Appellate Case No. 2019-000074

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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 23, 2019, a 10-day extension would allow the League to file its reply brief on January 2, 2020, and a 20-day extension would allow the League to file its reply brief on January 13, 2020. This is the League’s third 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 a 20-day extension.

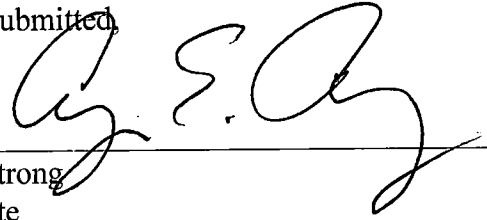
The basis of this motion is as follows:

The undersigned is lead counsel for the League in this matter. Counsel has had a personal medical situation arise over six weeks ago that has placed significant time and energy demands on her, and greatly diminished her ability to commit time and energy to her existing work load, most particularly to this matter. Specifically, counsel is the primary caregiver for a loved one who underwent an invasive medical procedure that has required counsel to coordinate in-home assistance for activities of daily living for the past six weeks. In addition to the time demanded of counsel, she has also experiencing anxiety caring for a loved one with very limited mobility and who is unable to eat, drink, or use the bathroom without assistance.

As a result, counsel's time and ability to attend to work-related responsibilities and plans has been severely restricted during these past six weeks with this slow and difficult recovery process. Even though in-home care is still needed, counsel has recently observed encouraging improvement. Yet, counsel has not been able to dedicate the resources necessary to prepare the League's reply brief for filing. In all candor to the Court, counsel does not anticipate being able to file even with a 10-day extension due to the care-giving demands coupled with the upcoming holidays. For that reason, counsel requests an extension of 20 days, or in the alternative, an extension of 10 days for filing her reply brief.

WHEREFORE, the Coastal Conservation League requests that this Court issue an order extending the League's reply brief deadline until January 13, 2020, or, alternatively, until January 2, 2020.

Respectfully submitted,



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Amy E. Armstrong  
Jessie A. White  
SOUTH CAROLINA ENVIRONMENTAL LAW  
PROJECT

Mailing address: Post Office Box 1380  
Pawleys Island, SC 29585

Office address: 430 Highmarket Street  
Georgetown, SC 29440

Telephone (843) 527-0078

FAX (843) 527-0540

Attorneys for the Appellant South Carolina Coastal  
Conservation League

Georgetown, South Carolina

December 23, 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:

Brad Churdar  
S.C. Dept. of Health and Envtl. Control  
1362 McMillan Avenue, Suite 400  
Charleston, SC 29405

Trenholm Walker  
Thomas Gressette  
Walker Gressette Freeman & Linton, LLC  
P.O. Drawer 22167  
Charleston, SC 29413

  
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Amy E. Armstrong

Georgetown, South Carolina

December 23, 2019