

STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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S.C. 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 BRIEFS**

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TO: ALL PARTIES AND THE SOUTH CAROLINA SUPREME COURT:

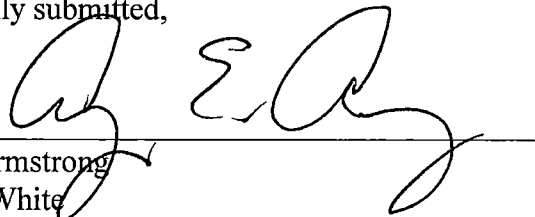
PLEASE TAKE NOTICE that the Appellant South Carolina Coastal Conservation League ("League") hereby moves the Supreme Court to extend the time for filing its initial reply brief to Respondents KDP II, LLC, and KRA Development, LP, and the South Carolina Department of Health and Environmental Control's ("DHEC") initial briefs. Presently the League's reply briefs are due January 13, 2020 and a 10-day extension would allow the League to file its reply briefs on January 23, 2020. This is the League's fourth 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 the requested extension. The basis of this motion is as follows:

The undersigned is lead counsel for the League in this matter. Counsel had a personal medical crisis arise that effectively prevented her from committing the time and energy necessary to prepare the League's reply briefs. Specifically, counsel was the primary caregiver for a loved one who underwent an invasive medical procedure that required counsel to coordinate in-home assistance for activities of daily living for over eight weeks. Recovery has finally improved to the point where in-home care ended the first week in January; however, since that time, counsel's working hours have nonetheless been diminished due to the continued medical care needs.

Counsel was finally able to begin committing time and energy to researching and drafting the reply brief the week of January 6, but needs more time in order to dedicate the resources necessary to fully prepare the League's reply brief for filing.

WHEREFORE, the Coastal Conservation League requests that this Court issue an order extending the League's reply brief deadline until January 23, 2020.

Respectfully submitted,



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PROJECT

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Attorneys for the Appellant South Carolina Coastal  
Conservation League

Georgetown, South Carolina  
January 13, 2020

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IN THE SUPREME COURT

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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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January 13, 2020