

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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JAN 27 2020

S.C. SUPREME COURT

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Ralph King Anderson, III, Administrative Law Judge

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.

**MOTION FOR LEAVE TO FILE A BRIEF
IN EXCESS OF PAGE LIMITS**

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 allow it to file its initial reply brief in excess of the page limits.

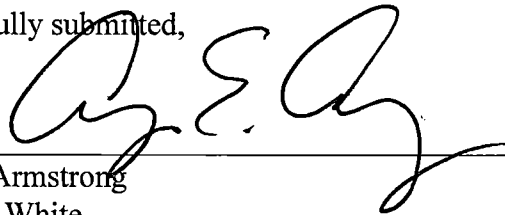
Counsel for the League determined that, for the sake of judicial economy and efficiency, it would file one single reply brief to the two respondents’ briefs, one of which exceeded the 50-page limit for opening briefs. Counsel worked diligently to stay within the 25-page limit for replies, but was unable to fully and adequately respond to all of the arguments within that limit. The League is requesting leave of the Court to file its reply brief, which is being contemporaneously filed with this motion, in excess of the page limit. The League’s brief

contains 27 pages of argument, plus a table of contents and a table of authorities, bringing the total number of pages to 30.

Counsel was unable to consult with the Respondents KDP II, LLC, and KRA Development, LP, and the South Carolina Department of Health and Environmental Control's ("DHEC") due to the fact that the need for excess pages was not realized until the date of filing, but believes that both Respondents would consent based on previous consents for KDP and the League to file longer briefs.

WHEREFORE, the Coastal Conservation League requests that this Court accept its reply brief as filed.

Respectfully submitted,



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PROJECT

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Conservation League

Georgetown, South Carolina

January 23, 2020

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CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing Initial Reply Brief and Motion for Leave to File a Brief in Excess of Page Limits on all parties by placing copies of same in the U.S. Mail addressed to:

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January 23, 2020