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**MAR 12 2020**

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

**S.C. SUPREME COURT**

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Shirley C. Robinson, Administrative Law Judge

Appellate Case No. 2017-000066

Pickens County, .....Respondent,

v.

South Carolina Department of Health and Environmental Control and  
MRR Pickens, LLC..... Petitioners.

**PETITIONERS' JOINT MOTION FOR EXTENSION OF TIME  
TO FILE PETITION FOR WRIT OF CERTIORARI**

Pursuant to Rules 240, 242, and 263(b), of the South Carolina Appellate Court Rules, Petitioners South Carolina Department of Health and Environmental Control (DHEC) and MRR Pickens, LLC (MRR) (collectively, Petitioners) respectfully and jointly move this Court for an extension of time to file a Petition for Writ of Certiorari to the Court of Appeals of its decision in this matter, *Pickens County v. South Carolina Department of Health and Environmental Control and MRR Pickens, LLC*, Op. No. 5707 (S.C. Ct. App. filed Jan. 8, 2020) (Shearouse Ad. Sh. No. 2 at 25). In support of this motion, Respondents state as follows:

1. The Court of Appeals filed a published opinion in the above-captioned matter, Opinion No. 5707, on January 8, 2020, reversing and remanding the matter to the Administrative Law Court.

2. Respondents filed a timely Petition for Rehearing with the Court of Appeals on January 23, 2020, which was denied by Order dated February 14, 2020.

3. Under Rule 242(c), SCACR, a petition for writ of certiorari to the opinion of the Court of Appeals is due to be filed on or before March 16, 2020.

4. By separate filing, the undersigned is noticing an appearance in this matter on behalf of MRR for the first time. Accordingly, to have adequate time to review the record on appeal in this matter, and consistent with other work obligations conflicting with the current deadline, counsel for Petitioners MRR and DHEC jointly request an extension of an additional ten (10) days to file a Petition.

5. If the Court grants this request, Counsel for the Petitioners calculates that they will have until March 26, 2020, in which to file a Petition for Writ of Certiorari.

6. This is the first request for an extension by Petitioners to this Court, and the time period requested is consistent with Supreme Court Order 2014-07-16-01.

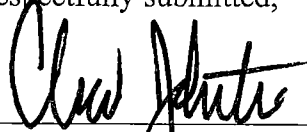
7. This request is made in good faith, not for purposes of delay, and Respondent Pickens County will not be prejudiced by this extension.

8. Counsel for the Petitioners have consulted with Counsel for the Respondent, and the undersigned is authorized to state that Respondent consents to the granting of this request.

Counsel for Petitioners DHEC and MRR therefore respectfully request that the Court grant this Motion and extend the time for filing a Petition for Writ of Certiorari to the Court of Appeals until March 26, 2020.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,



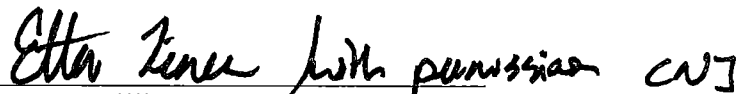
Chad N. Johnston  
**WILLOUGHBY & HOEFER, P.A.**  
930 Richland Street  
Post Office Box 8416  
Columbia, South Carolina 29202  
(803) 252-3300

R. Walker Humphrey, II  
**WILLOUGHBY & HOEFER, P.A.**  
133 River Landing Drive, Suite 200  
Charleston, South Carolina 29492  
(843) 619-4426

Jessica J.O. King  
**WILLIAMS MULLEN**  
1441 Main Street, Suite 1250  
Columbia, South Carolina 29201  
Telephone: (803) 567-4000

Robert F. Goings  
Jessica L. Gooding  
**GOINGS LAW FIRM, LLC**  
914 Richland Street, Suite A-101  
Columbia, South Carolina 29201  
Telephone: (803) 350-9230

*Attorneys for Petitioner MRR Pickens, LLC*



Etta R. Williams Linen, Assistant General Counsel  
Karen C. Ratigan  
**SOUTH CAROLINA DEPARTMENT OF  
HEALTH AND ENVIRONMENTAL CONTROL**  
2600 Bull Street  
Columbia, South Carolina 29201

*Attorneys for Petitioner South Carolina Department of  
Health and Environmental Control*

Columbia, South Carolina  
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**CERTIFICATE OF SERVICE**

This is to certify that I, Elizabeth Kurtz, a paralegal with the law firm Willoughby & Hoefler, P.A., have caused to be served this day one (1) copy of Petitioner MRR Pickens, LLC's **Notice of Appearance** and the **Joint Motion for Extension of Time** for Petitioners MRR Pickens, LLC and South Carolina Department of Health and Environmental Control by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows::

Gary W. Poliakoff, Esquire  
**Poliakoff & Associates, P.A.**  
P.O. Box 1571  
Spartanburg, SC 29304

Amy E. Armstrong, Esquire  
**South Carolina Environmental Law Project**  
P.O. Box 1380  
Pawley's Island, SC 29585

Michael G. Corley, Esquire  
**South Carolina Environmental Law Project**  
P.O. Box 5761  
Greenville, SC 29606

Etta R. Williams Linen, Esquire  
Karen C. Ratigan, Esquire  
**South Carolina Department of Health and Environmental Control**  
2600 Bull Street  
Columbia, SC 29201

  
Elizabeth Kurtz

Columbia, South Carolina  
This 12<sup>th</sup> day of March, 2020