

# WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL\*\*  
TRACEY C. GREEN  
CHAD N. JOHNSTON  
ELIZABETH ZECK\*  
ELIZABETHANN L. CARROLL  
JOHN W. ROBERTS  
R. WALKER HUMPHREY, II\*\*\*  
ANDREW R. HAND\*\*\*\*  
J. JOSEPH OWENS

ELIZABETH S. MABRY  
J. PATRICK HUDSON  
OF COUNSEL

JOSEPH H. FARRELL, III  
SPECIAL COUNSEL

\*ALSO ADMITTED IN TEXAS  
\*\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*\*ALSO ADMITTED IN CALIFORNIA  
\*\*\*\*ALSO ADMITTED IN NORTH CAROLINA

March 12, 2020

## VIA HAND DELIVERY

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, South Carolina 29201

RECEIVED

MAR 12 2020

S.C. SUPREME COURT

RE: *Pickens County v. S.C. DHEC and MRR Pickens, LLC*;  
Appellate Case No. 2017-000066

Dear Mr. Shearouse:

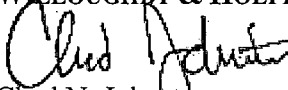
Enclosed for filing, please find the original and one (1) copy of the **Notice of Appearance** of Chad N. Johnston, Esquire and R. Walker Humphrey, Esquire, on behalf MRR Pickens, LLC, in the above-captioned matter. Please note that all existing counsel for MRR Pickens, LLC, remain additional counsel of record.

In addition, pursuant to Rules 240, 242, and 263(b), SCACR, enclosed for filing please find an original and seven (7) copies of the Joint Motion for Extension of Time for Petitioners MRR Pickens, LLC and South Carolina Department of Health and Environmental Control 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). Also enclosed is our filing fee check in the amount of fifty dollars (\$50). I would appreciate it if you would acknowledge receipt of these document by file stamping the enclosed extra copies and returning them to me via our courier.

If you have any questions or if you need any additional information, please do not hesitate to contact me. With best regards, I am,

Very truly yours,

WILLOUGHBY & HOEFER, P.A.

  
Chad N. Johnston

### OFFICES:

COLUMBIA | 930 RICHLAND STREET, COLUMBIA, SC 29201 | 803.252.3300 FAX-803.256.8062  
CHARLESTON | 133 RIVER LANDING DRIVE, SUITE 200, CHARLESTON, SC 29492 | 843.619.4426 FAX 843.619.4490

The Honorable Daniel E. Shearouse

March 12, 2020

Page 2 of 2

---

cc: The Honorable Jenny Abbott Kitchings (via U.S. Mail with enclosure)  
Gary W. Poliakoff, Esquire (via U.S. Mail with enclosure)  
Amy E. Armstrong, Esquire (via U.S. Mail with enclosure)  
Michael G. Corley, Esquire (via U.S. Mail with enclosure)  
Etta R. Linen, Esquire (via U.S. Mail with enclosure)  
Karen C. Ratigan, Esquire (via U.S. Mail with enclosure)  
Jessica J.O. King, Esquire (via U.S. Mail with enclosure)  
Robert F. Goings, Esquire (via U.S. Mail with enclosure)



# The Supreme Court of South Carolina

Willoughby & Hoefler, P.A.

03/12/2020

## RECEIPT #92413

**Case No:** 2020-000448  
**Case Short Title:** Pickens County v. SCDHEC  
**Event:**  
**Fee Type:** Motion Fee Filed After 10-15-18  
**Amount:** \$50.00  
**Payment Type:** Check  
**Reference No:** 28992  
**Check/Money Order Date:** 03/12/2020  
**Comments:**