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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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MAR 23 2020

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas
Maite D. Murphy, Circuit Court Judge

SC Court of Appeals

Case No. 2019-001719

Innovative Waste Management Inc., Respondent,

v.

Crest Energy Partners, GP, LLC, Dunhill Products GP, LLC, Henry
Wuertz, Innovative Waste Management, Inc., Crest Energy Partners
LP, Dunhill Products LP, Edward H. Girardeau, C. Russ Lloyd,
Defendants, Of Whom,

Crest Energy Partners GP, LLC, Crest Energy Partners LP, Dunhill
Products, LP, and Henry Wuertz, are the Appellants.

MOTION FOR EXTENSION OF TIME

COMES NOW APPELLANTS, through undersigned counsel, who hereby respectfully
request an extension of time to File and Serve their Initial Brief and Designation of Matter to be
included in the Record on Appeal, pursuant to Rules 240 and 263(b), SCACR.

Appellants' Initial Brief and Designation of Matter are currently due on Monday, March
23, 2020, in accordance with the Court's Order and correspondence of February 21, 2020. At that
time, the undersigned set aside much of the week of March 16, 2020 toward those efforts.
However, events of the past two weeks relating and secondary to the domestic outbreak and spread
of the COVID-19 virus have required the reallocation of that time to other personal and
professional matters, which appears to be a common issue throughout the Bar.

Appellants submit that this unprecedented situation constitutes good cause for the requested extension. Given the general uncertainty surrounding the expected progression of the outbreak and the potential that a blanket extension of such deadlines may be issued in the near future, Appellants request that the extended deadline be set no sooner than April 6, 2020, but ultimately leave the length of the requested extension within the sound discretion of the Court.

RESPECTFULLY SUBMITTED:



David B. Marvel (SCB# 68803)

P.O. Box 22734

Charleston, SC 29413

(P) 843-853-4877

(F) 843-380-3025

dave@marvel.lawyer

ATTORNEY FOR THE APPELLANTS

March 20, 2020
Charleston, South Carolina

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Products, LP, and Henry Wuertz, are the Appellants.

CERTIFICATE OF SERVICE

I certify that on March 20, 2020, I served the foregoing Motion for Extension of Time on
the Respondent, Innovative Waste Management, Inc., by transmitting a copy to its attorney, Wm.
Michael Gruenloh, by Facsimile and U.S. Mail.



David B. Marvel (SCB# 68803)
P.O. Box 22734
Charleston, SC 29413
(P) 843-853-4877
(F) 843-380-3025
dave@marvel.lawyer
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March 20, 2020
Charleston, South Carolina



DAVID B. MARVEL

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Attorney at Law • Proctor in Admiralty
Certified Civil and Federal Court Mediator
Admitted to Practice in South Carolina and Georgia
www.marvel.lawyer

MAR 23 2020
SC Court of Appeals

March 20, 2020

VIA FAX TO (803) 734-1839 and U.S. Mail

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

Re: Innovative Waste Mgmt. v. Crest Energy Partners, *et al.*
Case No. 2019-001719

Dear Ms. Kitchings,

I hope this letter finds you and everyone at the Court well. I have enclosed a Motion for Extension of Time to file our Initial Brief and Designation of Matter, along with a certificate of service and a check for the filing fee.

In the event the Court issues a blanket extension in all pending matters, thereby mooted this motion, you may shred the enclosed documents without need for processing or returning.

Thank you for your continued assistance with this matter. With best regards, I remain

Sincerely,

David B. Marvel

/DBM


cc: Wm. Michael Gruenloh (*via facsimile*)



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Charleston, South Carolina 29413

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