

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

Case No. 2019-001719

**RECEIVED**  
**Apr 09 2020**  
**SC Court of Appeals**

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.

**APPELLANTS' SECOND MOTION FOR EXTENSION OF TIME**

COMES NOW APPELLANTS, through undersigned counsel, who hereby respectfully  
request a second 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, and In Re:  
Operation of the Appellate Courts During the Coronavirus Emergency, Order No. 2020-03-20-01  
(S.C. Sup. Ct. March 20, 2020).

Appellants' Initial Brief and Designation of Matter are currently due on Monday, April 13,  
2020, in accordance with the Court's Order of March 25, 2020 granting Appellants first Motion  
for Extension of Time. Appellants respectfully request an additional fourteen (14) days to files  
their Initial Brief and Designation of Matter, which would extend the current due date until April

27, 2020.

When the undersigned filed the first motion, the initial deadline was rapidly approaching, the executive branch of South Carolina government had ordered school closures, and but the timing and extent of general public restrictions were uncertain. Since that time there have been significant developments and restrictions ordered and it now appears that the closures and mandates will continue for some time, generally affecting counsel and their clients, limiting scheduling availability, and requiring the diversion of resources to familial responsibilities and urgent/time-sensitive professional responsibilities. The Supreme Court has explicitly recognized these issues in its Orders regarding court closures and modified procedures, and Appellants submit that good cause exists for this second requested extension. Appellants respectfully request that the Court grant this Motion, and re-set Appellant's deadline for filing their Initial Brief and Designation of Matter for April 27, 2020.

RESPECTFULLY SUBMITTED:



David B. Marvel (SCB# 68803)

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ATTORNEY FOR THE APPELLANTS

April 9, 2020  
Charleston, South Carolina

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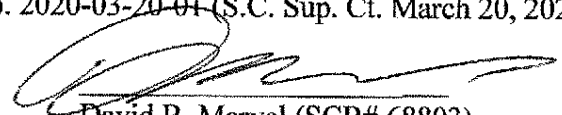
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Defendants, Of Whom,

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

**CERTIFICATE OF SERVICE**

I certify that on April 9, 2020, I served the foregoing Second Motion for Extension of Time on the Respondent, Innovative Waste Management, Inc., by transmitting a copy to its attorney, Wm. Michael Gruenloh, by email, pursuant to In Re: Operation of the Appellate Courts During the Coronavirus Emergency, Order No. 2020-03-20-01 (S.C. Sup. Ct. March 20, 2020).



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ATTORNEY FOR THE APPELLANTS

April 9, 2020  
Charleston, South Carolina



DAVID B. MARVEL

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

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**SC Court of Appeals**

April 9, 2020

**VIA FAX TO (803) 734-1839**

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 Second Motion for Extension of Time to file our Initial Brief and Designation of Matter, along with a certificate of service.

Pursuant to the directives of the Supreme Court and Judicial Department, I am filing this motion by facsimile only and I understand there is no filing fee.

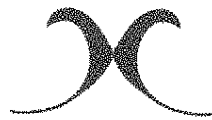
Thank you for your continued assistance with this matter. If you have any questions, comments, or concerns, please do not hesitate to contact me. With best regards, I remain

Sincerely,

David B. Marvel

/DBM

cc: Wm. Michael Gruenloh (*via email to mike@gruenlohlaw.com*)



DAVID B. MARVEL

Attorney at Law • Proctor in Admiralty  
Certified Civil and Federal Court Mediator  
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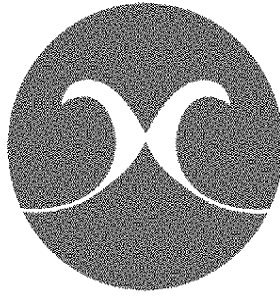
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Sincerely,

David B. Marvel

/DBM

cc: Wm. Michael Gruenloh (*via email to mike@gruenlohlaw.com*)



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**SC Court of Appeals**

**FAX COVER SHEET**

**April 9, 2020**

TO: Clerk, SCCOA (803) 734-1839

FROM: David B. Marvel

RE: IWM v. Crest Energy Partners  
Case No. 2019-001719

5 Pages Including Cover

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