

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

RECEIVED

The Honorable S. Phillip Lenski, Administrative Law Judge

APR 23 2020

SC Court of Appeals

Appellate Case No. 2019-001282

Case No. 17-ALJ-07-0085-CC

Richard J. Hook and Phillip Patterson.....Respondents,

vs.

South Carolina Department of Health and Environmental Control.....Appellant.

**MOTION FOR EXTENSION OF TIME  
TO FILE APPELLANT'S REPLY BRIEF**

TO: THE COURT AND COUNSEL FOR ALL PARTIES

PLEASE TAKE NOTICE that, pursuant to Rule 263, SCACR, Appellant South Carolina Department of Health and Environmental Control ("SCDHEC" or the "Department"), hereby respectfully moves before this Court for an Order extending the time for filing its Reply Brief. The deadline for submission of the Appellant's Reply Brief is April 20, 2020. The Department seeks an extension of ten (10) days, making the Department's deadline for filing its Reply Brief April 30, 2020. The basis for this motion is as follows:

This extension is requested due to Respondent's counsel's workload. Department Counsel is working on filings due to multiple Courts in the coming weeks while adapting to telecommuting and safeguarding his family due to COVID-19. As such, Counsel will not have adequate time to prepare the Appellant's Reply Brief in this matter. Mr. Phillip Patterson as well as Counsel for Richard J. Hook consent to this extension.

WHEREFORE, Respondent SCDHEC respectfully moves this Court for an Order extending the time for filing the Appellant's Reply Brief until April 30, 2020. The Department respectfully requests that all other deadlines be held in abeyance pending the Court's approval of this extension.

Respectfully submitted,



Bradley D. Churdar (SC Bar #12829)  
Associate General Counsel  
South Carolina Department of Health  
and Environmental Control  
1362 McMillian Ave, Suite 400  
Charleston, SC 29405  
[churdabd@dhec.sc.gov](mailto:churdabd@dhec.sc.gov)

April 17, 2020  
Charleston, South Carolina

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date he has served the Appellant, South Carolina Department of Health and Environmental Control's *Motion for Extension of Time to File Appellant's Reply Brief* in this matter upon the following, by placing copies of same in the United States Mail, first class postage prepaid, addressed to:

Mary D. Shahid, Esquire  
Angelica M. Colwell, Esquire  
Nexsen Pruet  
Post Office Box 486  
Charleston, SC 29402  
[mshahid@nexsenpruet.com](mailto:mshahid@nexsenpruet.com)

Phillip Brent Patterson  
627 Parrot Point Drive  
Charleston, SC 29412

  
Candice Shaver

April 17, 2020



Healthy People. Healthy Communities.

April 17, 2020

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

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APR 23 2020

SC Court of Appeals

Re: Richard J. Hook v. SCDHEC and Phillip Patterson  
In Re: Ford Development Corp. v. SCDHEC, Docket No. 05-ALJ-07-0031-CC  
Case Tracking No. 2019-001282

Dear Ms. Kitchings:

Please find enclosed the Motion for Extension of Time to File Appellant South Carolina Department of Health and Environmental Control's Reply Brief in the above referenced case.

***Please address all correspondence in this matter to my attention at [churdabd@dhec.sc.gov](mailto:churdabd@dhec.sc.gov).***

Thank you for your attention in this matter.

Very truly yours,

A handwritten signature in black ink that reads "Brad Churdar".

Bradley D. Churdar  
Associate General Counsel

cc: Mary D. Shahid, Esquire  
Angelica M. Colwell, Esquire  
Phillip Brent Patterson



Ocean & Coastal Resource Management  
1362 McMillan Ave., Suite 400  
Charleston, SC 29405

Return Service Requested

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
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