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**DELIVERED VIA ELECTRONIC MAIL**

Jenny Abbott Kitchings, Clerk of Court  
Court of Appeals  
1220 State Street  
Columbia, SC 29201

**RECEIVED**  
**Jun 03 2020**  
**SC Court of Appeals**

June 3, 2020

**Re: Appellate Case No.: 2019-001719  
Innovative Waste Management, Inc., Respondent, v. Crest Energy Partners  
GP, LLC et al.**

Dear Mrs. Kitchings:

Respondents are in receipt of Mr. Marvel's June 2, 2020 letter to you in which he states that Appellants' motion has been "effectively granted" by Supreme Court Order No. 2020-000447. We respectfully disagree and request the Court issue a ruling on Appellants' Motion to Enlarge Time and Respondent's Motion to Dismiss all of which have been briefed.

The order entitled In re: Operation of the Appellate Courts During the Coronavirus Emergency is an amendment to the Supreme Court's March 20, 2020 order which grants an automatic 20 day extension to any deadline falling after March 20, 2020. The practice was open ended in the original March Order.

The Court had already granted Appellants more than the 20 day automatic extension. The recent Amendment ends the practice of 20 day automatic extensions; it does not, as Mr. Marvel suggests in his letter, provide a new 20 day extension for cases that already benefitted from the March 20, 2020 order and additional enlargements of time granted on top of that.

Appellants had on March 20, 2020 requested an enlargement of time to file their brief. The Supreme Court issued the original order granting automatic extensions the same day. It is believed that Appellants had not seen the Order granting automatic extensions at the time they filed for their enlargement of time.

Appellants' initial brief was originally due March 21, 2020. By virtue of the Supreme Court's order they now, automatically had until April 10, 2020.

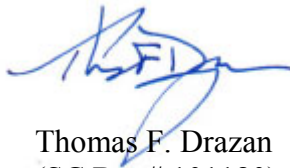
The Appellate Court a day later, in respect of and full knowledge of the March 20, 2020 order granted Appellants an extension to April 13, 2020, 3 days longer than the automatic 20 day extension the Supreme Court's order had granted.

Despite this Appellants again requested an enlargement of time. The Court granted another extension expressly stating that the deadline to file their initial brief was now April 27, 2020.

The May Order amends the March Order to end that practice for new deadlines occurring after June 8, 2020. It does not, as Mr. Marvel suggests in his letter, provide a blanket extension for every missed deadline, especially in situations like this appeal where the Court has already granted prior extensions and placed specific conditions (the requirement of a showing of extraordinary circumstances) upon the granting of any further extensions.

As such Respondent requests that the Court issue an order on the filings seeking a dismissal of the Appeal.

Respectfully,



Thomas F. Drazan  
(SC Bar # 101180)

cc: David Marvel (via Electronic Mail)