

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SOUTH CAROLINA
PROCUREMENT REVIEW PANEL

Appellate Case No. 2020-000859

IN RE: Request for Review by Advanced Drainage Systems, Inc.
Of SCDOT Proposed Changes to SC-M-714, 714 Series Standard
Drawings, and PCDM-05

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JUN 25 2020

SC Court of Appeals

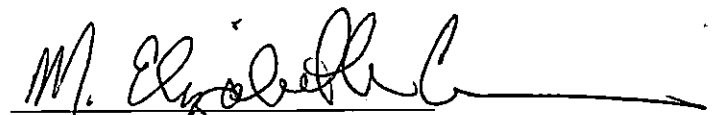
MOTION FOR EXTENSION

Advanced Drainage Systems, Inc.'s Initial Brief and Designation of Matter to be Included on Appeal is currently due July 9, 2020. Due to several conflicts, listed below, in undersigned counsel's schedule, Appellant requests an extension to serve and file the Initial Brief and Designation of Matter to be Included on Appeal, making it due on or before October 16, 2020. Counsel for the South Carolina Department of Transportation, South Carolina Procurement Review Panel, and the Chief Procurement Officer have consented to this extension.

Counsel for the Appellant has a very full hearing/deposition schedule in July, August and September, with the last trial in federal court anticipated to end September 24, which involves potential changes to South Carolina's general election voting law requirements. There will be extensive discovery in this case due to the number of parties involved, as well as the expectation of a large number of expert witnesses. An Intervener has made an appearance in the case.

Additionally, counsel is involved in a second case in federal court with more witnesses, with an expected filing of a Preliminary Injunction request on or before August 3, to seek to enjoin the State from enforcing the witness requirement, the age limit on absentee voting pursuant to the Twenty-sixth (26th) amendment to the United States Constitution, the deadline for receipt of absentee votes that are mailed in and multiple other issues that are not encompassed in the September trial.

Additionally, counsel has two major ALC cases that will be having motions and/or discovery in July and August.



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June 25, 2020
Columbia, South Carolina

Attorneys for Appellant

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CERTIFICATE OF SERVICE

I, Ann Shuler, an employee of Burr & Forman, LLP, hereby certify that true and correct copies of the **Appellant's Motion for Extension** was served upon counsel of record in the above-captioned matter, by causing a copy of same to be deposited in the United States Mail, first class postage prepaid, this 25th day of June, 2020, addressed as follows:

Barbara Munig Wessinger, Esquire
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June 25, 2020

VIA HAND DELIVERY

Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

**Re: IN RE: Request for Review by Advanced Drainage Systems, Inc. of SCDOT
Proposed Changes to SC-M-714, 714 Series Standard Drawings, and PCDM-05
Appellate Case No.: 2020-000859**

Dear Ms. Kitchings:

Please find enclosed for filing, the original and one copy of the Appellant's Motion for Extension regarding the above referenced appeal. Please file the original in your office and return the file stamped copy to us via our courier.

Sincerely,

Burr Forman McNair



Ann Shuler
Paralegal

MAS/as

cc: Barbara Munig Wessinger, Esquire
Manton M. Grier, Esquire
Cherlyn Walden Borjes, Esquire
Linda C. McDonald, Esquire