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Sep 21 2020
SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM THE CHARLESTON COUNTY COURT OF COMMON PLEAS
Mikell R. Scarborough, Circuit Court Judge

Appellate Case No. 2020-000937

City of Folly Beach, Coastal Conservation League, Save Folly Beach, Inc., John Collins,
Matt Napier, Paula Stubblefield, Troy Bode, and Carol Kruer. Appellants,

vs.

State of South Carolina, Amy Connelly, Jeffrey H. Morris, Michael Vandaele, Stephen Rawe,
Juan Enterprises, LLC, Juanita A Wright, Debbie's Folly, LLC, and
Vernon Staubes, Respondents,

**MOTION FOR EXTENSION OF TIME FOR FILING
INITIAL BRIEF AND DESIGNATION OF MATTER**

TO: ALL PARTIES AND THE COURT OF APPEALS:

PLEASE TAKE NOTICE that the Appellants hereby move the Court of Appeals for an extension of time for filing their initial brief and designation of matter. The initial brief and designation are due on September 21, 2020, and the League seeks an extension of thirty days until October 21, 2020. This is the second extension request.

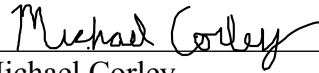
Undersigned counsel requests this extension based on circumstances created by the covid-19 health crisis and based on the complexity of the legal issues involved in this appeal.

Undersigned has experienced the same diminished efficiency as many other parents who've been forced to shift school and childcare arrangements on account of the health crisis. Further, the legal issues raised in this appeal are novel and require more extensive legal research than is

typical of a case before this Court. For these reasons, undersigned submits that the requested 30-day extension is appropriate.

Respondents State of South Carolina, Juan Enterprises, LLC, Juanita A Wright, and Vernon Staubes have consented to the extension, and the remaining Respondents have not expressed a position as of the filing of this motion.

WHEREFORE, the Appellants request that this Court issue an order extending the time to file their initial brief and designation of matter until October 21 2020.



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Leslie Lenhardt
SOUTH CAROLINA ENVIRONMENTAL LAW
PROJECT

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Attorneys for the Appellants

Georgetown, South Carolina
September 21, 2020

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Juan Enterprises, LLC, Juanita A Wright, Debbie’s Folly, LLC, and
Vernon Staubes, Respondents,

CERTIFICATE OF SERVICE

I hereby certify that on this date I served the foregoing Motion for Extension of Time
upon the Respondents by electronic mail, distributed to the following:

Jeff Tibbals, Esq.
Attorney for Amy Connelly and Debbie’s Folly, LLC

Emory Smith, Esq.
Attorney for the State of South Carolina

Rita Barker, Esq.
Attorney for Juanita Wright and Juan Enterprises, LLC

Bruce Wallace, Esq. and Mary Shahid, Esq.
Attorneys for Stephen Rawe and Jeffrey Morris

Kerry Koon, Esq.
Attorney for Vernon Staubes

Michael Corley

Michael Corley

Georgetown, South Carolina

September 21, 2020

**RE: SC Court of Appeals: City of Folly Beach v. State of South Carolina
(2020-000937)**

From: [Michael Corley <michael@scelp.org>](mailto:michael@scelp.org)
Reply-To: michael@scelp.org
To: [Rita Bolt Barker <rbarker@wyche.com>](mailto:rbarker@wyche.com), ['Kerry Koon' <kerrykoon@hotmail.com>](mailto:kerrykoon@hotmail.com),
[Emory Smith <ESmith@scag.gov>](mailto:ESmith@scag.gov), [Jeff Tibbals <jst@bybeetibbals.com>](mailto:jst@bybeetibbals.com),
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[Bruce Wallace <BWallace@nexsenpruet.com>](mailto:Wallace@nexsenpruet.com)
Cc: [Leslie Lenhardt <leslie@scelp.org>](mailto:leslie@scelp.org)
Subject: Re: SC Court of Appeals: City of Folly Beach v. State of South Carolina (2020-000937)
Date: Monday, September 21, 2020 3:25 PM
Size: 100 KB

I am attaching, for service upon your clients, our motion for extension of time in the above-referenced case.

Thanks.

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Michael Corley
Upstate Director
South Carolina Environmental Law Project
(864) 412-7921

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Sep 21 2020

SC Court of Appeals

second extension filed.pdf 71 KB