

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

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' MOTION FOR EXTENTION OF TIME
TO FILE INITIAL REPLY BRIEF**

COME NOW APPELLANTS, through undersigned counsel, pursuant to Rule 263(b), SCACR, who hereby respectfully request a fourteen (14) day extension of time to serve and file their Initial Reply Brief and Designation of Matter. Appellants' Initial Reply Brief is currently due on or before October 5, 2020. The Appellants hereby request that this deadline be extended until October 19, 2020.

In support of this Motion, Appellants state that this request is not made with an intent to further delay this appeal or for any ulterior purpose, but is requested to allow for sufficient time for counsel to prepare the Initial Reply Brief given the scope of the time and issues addressed in

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this appeal, as well as to accommodate scheduling issues in other pending cases which have been suddenly revived following Chief Justice Beatty's September 14, 2020 Memorandum on Court Operations. The undersigned appreciates the Court's prior accommodations in this matter and do not foresee that an additional fourteen-day extension of time will unduly delay the overall progress of this appeal. Appellants submit that the foregoing constitute good cause for granting the requested fourteen day extension of time.

Appellants hereby respectfully request that the Court grant this Motion for Extension of time, allowing Appellants an additional fourteen days to file and serve their Initial Reply Brief and Designation of Matter.

RESPECTFULLY SUBMITTED:

s/ David B. Marvel
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September 25, 2020
Charleston, South Carolina

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 25th day of September, 2020 I served Respondent's counsel with Appellants' Motion for Extension of Time to File Initial Reply Brief, by mailing a copy to its counsel by U.S. Mail, postage prepaid, at the following address:

Wm. Michael Gruenloh
Gruenloh Law
67 Moultrie St., Second Floor
Charleston, SC 29403

s/ David B. Marvel
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September 25, 2020
Charleston, South Carolina



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Admitted to Practice in South Carolina and Georgia

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Via E Filing

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Innovative Waste Mgmt. v. Crest Energy Partners, *et al.*
Case No. 2019-001719

Dear Ms. Kitchings,

I hope all is well with you. I hereby submit a Motion for Extension of Time for Appellants to File their Initial Reply Brief. Please file this in the Record in your usual prompt and efficient manner. I look forward to receiving the Court's decision on this Motion.

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

Sincerely,

David B. Marvel

/DBM

Cc: Wm. Michael Gruenloh