

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

RECEIVED

Nov 23 2020

SC Court of Appeals

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 SERVE THE RECORD ON APPEAL**

COME NOW APPELLANTS, through undersigned counsel, pursuant to Rule 263(b), SCACR, who hereby respectfully request a thirty (30) day extension of time to serve the Record on Appeal. The Record on Appeal is currently due to be served on November 23, 2020. The Appellants hereby request that this deadline be extended until December 23, 2020.

In support of this Motion, Appellants note that no previous extension of this deadline has been sought or granted. On November 9, 2020, Appellants submitted an Amended Reply Brief pursuant to instructions from the Clerk of Court, and mistakenly believed that the thirty day period for serving the record on appeal ran from that date, rather than the original filing date of the Initial

Reply Brief. This request is made to allow for sufficient time for counsel to prepare a complex Record on Appeal, and not with an intent to further delay this appeal or for any ulterior purpose. The undersigned anticipates that this will require the preparation of a preliminary version for transmittal to Respondent's counsel, as the Designation and Counter-Designations of matter appear to contain much of the same material, although designated by different names. Appellants submit that the foregoing constitute good cause for granting the requested extension of time.

Appellants hereby respectfully request that the Court grant this Motion for Extension of time, allowing Appellants an additional thirty days to serve the Record on Appeal.

RESPECTFULLY SUBMITTED:

s/ David B. Marvel
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November 23, 2020
Charleston, South Carolina

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day of November, 2020 I served Respondent's counsel with Appellants' Motion for Extension of Time to Serve the Record on Appeal., by mailing a copy to its counsel by U.S. Mail, postage prepaid, at the following address:

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s/ David B. Marvel
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November 23, 2020
Charleston, South Carolina