



Telephone (803) 881-8920  
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)  
Post Office Box 6923  
Columbia, South Carolina 29260

**RECEIVED**  
**Jan 04 2021**  
**SC Court of Appeals**

**ANDREW F. LINDEMANN\***  
Direct Dial: (803) 881-8921  
Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

**JAMES M. DAVIS, JR.†**  
Direct Dial: (803) 881-8922  
Email: [jim@ldlawsc.com](mailto:jim@ldlawsc.com)

\*Also Admitted in North Carolina  
†Certified Mediator

---

*Of Counsel*

**STEVEN R. SPREEUWERS**  
Direct Dial: (803) 373-2268  
Email: [steve@ldlawsc.com](mailto:steve@ldlawsc.com)

January 4, 2021

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: South Carolina Coastal Conservation League, Inc., Elizabeth M. Smith, Abraham B Jenkins, Jr., and South Carolina Public Interest Foundation v. Charleston County, South Carolina, South Carolina Transportation Infrastructure Bank, and South Carolina Department of Transportation  
Appellate Case Number: 2020-001189  
Civil Action Number: 2019-CP-40-3032  
Our File Number: 79.20422

Dear Ms. Kitchings:

This letter is to request a thirty-day extension of time to file the Initial Brief of Respondent South Carolina Department of Transportation and its Designation of Matter to be Included in the Record on Appeal in the above referenced appeal. I have just recently been retained to represent the Respondent in this appeal, and as a result, I do need some additional time. Additionally, other obligations and deadlines will prevent me from completing this brief by the current deadline of January 4, 2021. No previous extension has been requested.

By my calculations, the Initial Brief of Respondent South Carolina Department of Transportation and its Designation of Matter will be due on or before February 3, 2021. If you require a formal motion, please advise.

Thank you very much for your consideration of this request.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb

The Honorable Jenny Abbott Kitchings  
January 4, 2021  
Page Two

---

cc: Linda C. McDonald, Esquire (*Via Email Only*)  
W. Andrew Gowder, Jr., Esquire (*Via Email Only*)  
Christopher K. DeScherer, Esquire (*Via Email Only*)  
Angela M. Kilbert, Esquire (*Via Email Only*)  
Robert E Tyson, Jr., Esquire (*Via Email Only*)  
Samuel J. Wellborn, Esquire (*Via Email Only*)  
Jasmine D. Smith, Esquire (*Via Email Only*)  
Johanna S. Gardner, Esquire (*Via Email Only*)  
Bernard E. Ferrara, Jr., Esquire (*Via Email Only*)  
James G. Carpenter, Esquire (*Via Email Only*)