

RECEIVED

Jan 06 2021

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 REPLY BRIEF**

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 reply brief. The reply brief is due on January 11, 2021 and the Appellants seek an extension of ten days until January 21, 2021. This is the second extension request.

Undersigned counsel requests this extension for multiple reasons, including circumstances created by the covid-19 crisis and the departure of Michael G. Corley, Esq., from full-time employment with the South Carolina Environmental Law Project. Mr. Corley has been the lead counsel in this matter and because he took another position on January 4, his responsibilities as lead counsel have shifted to the undersigned. Meanwhile, the undersigned

counsel has experienced difficulty meeting existing work obligations resulting from her childrens' school schedules due to the covid crisis, which have impaired her ability to spend the focused time needed to prepare a reply brief. The recent holidays, and long-standing time off with family and to care for her out-of-school children, have further hindered the undersigned's ability to work on the reply brief.

Counsel for Appellants has consulted with counsel for Respondents, who consent to the requested extension.

WHEREFORE, the Appellants request that this Court issue an order extending the time to file its initial brief and designation of matter until January 21, 2021.

Leslie S. Lenhardt
SOUTH CAROLINA ENVIRONMENTAL LAW
PROJECT

Mailing address: Post Office Box 1380
Pawleys Island, SC 29585

Office address: 430 Highmarket Street
Georgetown, SC 29440

Telephone (843) 527-0078

FAX (843) 527-0540

Attorney for the Appellants

Georgetown, South Carolina

January 6, 2021