

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

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Case No. 2019-CP-40-03032  
Appellate Case No. 2020-001189

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**RECEIVED**

**Jan 12 2021**

**SC Court of Appeals**

South Carolina Coastal Conservation League,  
Inc., Elizabeth M. Smith, Abraham B. Jenkins,  
Jr.

Appellants,

and

South Carolina Public Interest Foundation,

Plaintiff,

v.

Charleston County, South  
Carolina, South Carolina  
Transportation Infrastructure  
Bank, and South Carolina  
Department of Transportation,

Respondent  
s.

**MOTION FOR EXTENSION OF TIME TO FILE  
APPELLANT'S REPLY BRIEF**

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Appellants, by and through their undersigned attorneys, respectfully request an extension of ten (10) days following the extended date granted to Respondent South Carolina Department of Transportation (February 3, 2021) to submit the Appellant's Initial Reply Brief. The extended deadline for filing the Initial Reply Brief would be February 13,

2021.

The motion is filed for good cause to clarify the date on which the Reply Brief is to be filed as Respondent South Carolina Transportation Infrastructure Bank has filed its Initial Respondent's Brief on January 4, 2021, Respondent Charleston County's brief was postmarked December 28, 2020, but only received by Appellants today, January 12, 2021, and Respondent South Carolina Department of Transportation has until February 3, 2021 to file its brief by order of this Court.

Respectfully submitted,

/s/ W. Andrew Gowder, Jr.

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January 12, 2021  
Charleston, South Carolina

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South Carolina Coastal  
Conservation League, Inc.,  
Elizabeth M. Smith, Abraham  
B. Jenkins, Jr. Appellants,

and

South Carolina Public Interest  
Foundation, Plaintiff,

v.

Charleston County, South  
Carolina, South Carolina  
Transportation Infrastructure  
Bank, and South Carolina  
Department of Transportation, Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of Motion for Extension of Time to file Appellant's Reply Brief in the above referenced case has been served upon the following by mailing a copy properly addressed with sufficient postage affixed thereto this the 12<sup>th</sup> day of January, 2021 to:

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