



STEPHEN B. SAMUELS  
P. JASON REYNOLDS  
ATTORNEYS AT LAW

February 16, 2021

**RECEIVED**

**Feb 16 2021**

**S.C. SUPREME COURT**

Via email: [suptfilings@sccourts.org](mailto:suptfilings@sccourts.org)

Via US Mail

Honorable Daniel E. Shearouse  
Clerk of Court, S.C. Supreme Court  
1231 Gervais Street  
Columbia, South Carolina 29201

Re: Chisolm Frampton v. SC Department of Natural Resources  
Appellate Case No. 2020-001644

Dear Mr. Shearouse:

Enclosed for filing please find Petitioner's Motion for Extension of Time to File Reply to Return to Petition for Writ of Certiorari. Also enclosed is the Proof of Service showing service upon the attorney for the Respondents. Please have your staff file return a clocked copy to my office.

In accordance with the Supreme Court's Rule of March 20, 2020, we will submit additional copies of the Motion at the Court's request and have omitted the filing fee. If you have any questions or concerns, please feel free to call me. Thank you for your assistance in this matter.

With kindest regards, I am

Yours very truly,

A handwritten signature in blue ink, appearing to read "Stephen B. Samuels", with a stylized flourish at the end.

Stephen B. Samuels

SBS/wp

Enclosure(s) as stated

cc: Kirsten L. Barr, Esquire  
John C. Land, III, Esquire

WE WORK FOR THE PEOPLE WHO WORK

1320 RICHLAND STREET, COLUMBIA, SC 29201 | P: (803) 779.4000 | F: (803) 779.4004 | WWW.SAMUELSREYNOLDS.COM