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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Bentley Price, Circuit Court Judge
Markley Dennis, Circuit Court Judge

Appellate Case No. 2022-001123

J. Doe Petitioner,

v.

Design Review Board (DRB) of the Town of Sullivans Island (S.I.), Svjetlana Bilic Damjanovic, Individually and d/b/a Alka Construction Co., Branko Damjanovic, Individually and d/b/a Alka Construction Co., Kenneth Craft, III, Individually and d/b/a Craft Design Co., and Alka Construction Co., Respondents.

**REPLY TO PETITIONER’S RETURN IN OPPOSITION TO RESPONDENTS’
MOTION TO DISMISS MOTION TO DISMISS APPEAL, AND ALTERNATIVELY,
RETURN TO PETITIONER’S MOTION FOR REMAND WITH ABEYANCE AND IN
THE ALTERNATIVE, PETITION FOR WRIT OF CERTIORARI**

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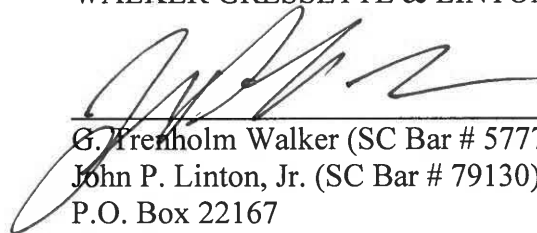
September 1, 2022
Charleston, South Carolina

The arguments advanced by Petitioner in the Return in Opposition to Respondents' Motion to Dismiss filed on August 29, 2022, are largely addressed in Respondent Design Review Board of The Town of Sullivans Island's ("DRB") Motion to Dismiss this Appeal, and alternatively, a Return to Petitioner's Motion for Remand with Abeyance and in the Alternative, Petition for Writ of Certiorari, which was filed August 15, 2022. The DRB refers the Court to its prior filing, rather than repeating arguments in this Reply. Petitioner's new argument is that it was improper for the DRB to attach the relevant filings to its motion. There is no basis for Petitioner's assertion that attaching the relevant documents to a motion is inappropriate, particularly considering Petitioner's failure to include an appendix with the petition for certiorari she filed. See Rule 242(e), SCACR. Petitioner also asserts that her filing of another improper motion in the Court of Appeals should delay this Court's decision, but Petitioner provides no legal argument for that assertion. For the reasons stated in the DRB's motion, this Court should address the matter and dismiss the appeal or deny certiorari. Furthermore, many of the DRB's arguments are not addressed at all by Petitioner. For that additional reason, the appeal should be dismissed, or certiorari denied.

Therefore, for all these reasons, and those previously briefed by the DRB, the appeal should be dismissed and/or certiorari denied.

Respectfully submitted,

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