

RECEIVED

Oct 18 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2022-000392
Circuit Court Case No. 2021-CP-10-00785

The Wolf Marie Vernon Trust,

Appellant,

v.

The Town of Mount Pleasant and the Mount Pleasant Board of
Zoning Appeals,

Respondents.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No.: 66468)
Brian L. Quisenberry (SC Bar No.: 73637)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
Charleston, South Carolina, 29401
P.O. Box 993, Charleston, SC 29402
(843) 720-5488
Attorneys for Respondents

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that **RESPONDENTS' INITIAL BRIEF** and **RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served on all other parties to this appeal on October 18, 2022, via email (see attached) to their following counsel of record:

Thomas J. Rode (thomas@tktlawyers.com)
Thurmond Kirchner & Timbes, P.A.
15 Middle Atlantic Wharf
Charleston, SC 29401
Attorneys for Appellant

Respectfully submitted,
CLEMENT RIVERS, LLP

By: *s/Stephen L. Brown*
Stephen L. Brown (SC Bar No. 66468)
Attorneys for Respondents

Charleston, South Carolina

October 18, 2022

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Tuesday, October 18, 2022 3:56 PM
To: 'scerone@tktlawyers.com'; 'thomas@tktlawyers.com'
Cc: Quisenberry, Brian; Mantiplay, Madison; 'Stephen Brown (sbrown@ycrlaw.com)'; Justman, Aimee
Subject: Wolf Marie Vernon Trust v. Town of Mount Pleasant et al.; Appellate Case No. 2022-000392 (CR 210600)
Attachments: DOM.pdf; Respondents' Initial Brief.pdf

Enclosed please find Respondents' Initial Brief and Designation of Matter in the above-referenced matter which will be filed today.

Thank you,

Pollyana Bell
Project Assistant
Commercial Litigation Practice Group
Phone:(843)720-5488 | Fax:(843)579-1369



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 500 • Charleston, SC 29401
FOR OFFICE