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THE STATE OF SOUTH CAROLINA  
In the court of appeals

**RECEIVED**

DEC 16 2022

APPEAL FROM CHARLESTON COUNTY **SC Court of Appeals**

Mikell R. Scarborough, Master-In-Equity

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,

v.

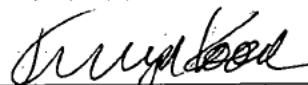
State of South Carolina, Amy Connelly, Jeffrey H. Morris, Michael Vandaele, Stephen Rawe,  
Juan Enterprises, LLC, Juanita Wright, Debbie's Folly, LLC, and Vernon Staubes,

Of which, State of South Carolina, Jeffery H. Morris, Stephen Rawe, Juan Enterprises, LLC,  
Juanita A. Wright, and Vernon Staubes are.....Respondents.

***MOTION TO SUBSTITUTE PARTY***

The undersigned, attorney of record for Vernon Staubes a/k/a Vernon Keller Staubes, in the above referenced appeal, hereby moves the Court to substitute Mr. Staubes' personal representative, as party Respondent. Mr. Staubes died October 3, 2022. Vernon Keller Staubes, Jr. has been appointed personal representative of Mr. Staubes' estate (Exhibit "A").

December 13, 2022



Kerry W. Koon  
147 Wappoo Creek Drive, Ste. 203  
Charleston, SC 29412  
(843) 795-7000  
Attorney for Respondent Staubes

Ex. "A"

STATE OF SOUTH CAROLINA	)	IN THE PROBATE COURT
COUNTY OF CHARLESTON	)	CERTIFICATE OF APPOINTMENT
IN THE MATTER OF:	)	CASE NUMBER: <u>2022ES1001825</u>
<u>VERNON KELLER STAUBES</u>	)	
(Decedent)	)	

This is to certify that

VERNON KELLER STAUBES, JR.

is/are the duly qualified

- PERSONAL REPRESENTATIVE
- SUCCESSOR PERSONAL REPRESENTATIVE
- SPECIAL ADMINISTRATOR

in the above matter and that this appointment, having been executed on the 14 day of October, 2022, is in full force and effect.

RESTRICTIONS: NONE

Executed this 14 day of October, 2022.

  
 Irvin G. Condon, Probate Court Judge  
 BY ESTATE CLERK

**Do not accept a copy of this certificate without the raised seal of the Probate Court.**

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v.

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Juan Enterprises, LLC, Juanita Wright, Debbie's Folly, LLC, and Vernon Staubes,

Of which, State of South Carolina, Jeffery H. Morris, Stephen Rawe, Juan Enterprises, LLC,  
Juanita A. Wright, and Vernon Staubes are.....Respondents.

***PROOF OF SERVICE***

I certify that I have served Respondent Vernon Staubes' Motion to Substitute Party, by depositing  
a copy of it in the United States Mail, postage prepaid, on December 13, 2022, addressed to the following:

Michael Gary Corley, Esq.  
408 Conestee Road  
Greenville, SC 29605

Leslie S. Lenhardt, Esq.  
PO Box 1380  
Pawleys Island, SC 29585

Rita Bolt Barker, Esq.  
PO Box 728  
Greenville, SC 29601-3512

Mary Duncan Shahid, Esq.  
PO Box 486  
Charleston, SC 29402

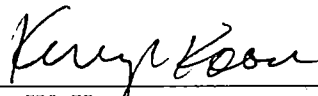
Robert Bruce Wallace, Esq.  
205 King Street, Ste. 400  
PO Box 486  
Charleston, SC 29402

Gregory Jacobs English, Esq.  
PO Box 728  
Greenville, SC 29602-0728

Angelica M. Colwell, Esq.  
PO Box 486  
Charleston, SC 29402

J. Emory Smith, Jr., Esq.  
PO Box 11549  
Columbia, SC 29211

December 13, 2022



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Kerry W. Koon  
147 Wappoo Creek Drive, Ste. 203  
Charleston, South Carolina 29412  
(843) 795-7000  
Attorney for Respondent Staubes

Telephone: Bus: (843) 795-7000  
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**KERRY W. KOON**

*Attorney at Law*  
147 Wappoo Creek Drive  
Wappoo Centre, Suite 203  
Charleston, South Carolina 29412

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**SC Court of Appeals**

December 13, 2022

Jenny Abbott Kitchings, Clerk of Court  
S.C. Court of Appeals  
PO Box 11629  
Columbia, SC 29211

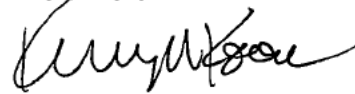
**RE: *City of Folly Beach v. State of South Carolina***  
***Appellate Case No. 2020-000937***

Dear Madam Clerk,

Please find enclosed an original and ~~six (6) copies~~ of a Motion to Substitute Party pursuant to Rule 240, S.C.R.A.P. regarding the above referenced matter together with a Proof of Service of the same.

With kindest personal regards, I am

Very truly yours,



Kerry W. Koon

*I enclosed  
1 copy to return  
in stamped envelope  
provided.*

KWK:mmm  
Enclosures

cc: All interested parties

*Kerry W. Koon, Esq.  
147 Wappoo Creek Drive, Ste. 203  
Charleston, SC 29412*



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**SC Court of Appeals**

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