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Dec 20 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas
The Honorable J. Cordell Maddox, Jr.

Case No. 2022-CP-37-00396

John's Marine Service, Inc., Frances J. Ratliff, Edward J. Ratliff, Jr., James L. Ratliff,
Lucretia B. Morgan, Sherri Akers Crisp, Amy Cawthon,

Appellants,

v.

Oconee County Board of Zoning Appeals, Ridgewater Engineering & Surveying, LLC, Globe, a
South Carolina Limited Partnership, and Farnes, a South Carolina Limited Partnership,

Respondents.

NOTICE OF APPEAL

John's Marine Service, Inc., Frances J. Ratliff, Edward J. Ratliff, Jr., James L. Ratliff, Lucretia B. Morgan, Sherri Akers Crisp, Amy Cawthon appeal the Honorable J. Cordell Maddox, Jr.'s Order denying their appeal of the Oconee County Board of Zoning Appeals's decision approving road variance application VA#21-011, attached as **Exhibit 1**. Appellants received notice of entry of the Order on September 15, 2022, and filed a Motion to Alter or Amend on September 23, 2022. Appellants' Motion to Alter or Amend was denied by order dated November 21, 2022, attached as **Exhibit 2**.

/s/ David L. Paavola
Keith M. Babcock, SC Bar #456
David L. Paavola, SC Bar# 100714
LEWIS BABCOCK L.L.P.
P.O. Box 11208
Columbia, South Carolina 29211
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dlp@lewisbabcock.com

Attorneys for Appellant

December 20, 2022

Other counsel of record:

James W. Logan, Jr., SC Bar #3385
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Attorney for Respondent, Oconee County Board of Zoning Appeals

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Andrew K. Holliday (S.C. Bar #101754)
Derrick, Ritter, Williams & Morris P.A.
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andrew@drwmlaw.com

Attorneys for Respondents,
Globe, a South Carolina Limited Partnership,

and Farnes, a South Carolina Limited Partnership

Respondent, Ridgewater Engineering & Surveying LLC

Ridgewater Engineering & Surveying LLC

211 Society Street

Anderson, South Carolina 29621

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Respondents.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on James W. Logan, Jr., counsel for Respondent Oconee County Board of Zoning Appeals, by email sent to his primary e-mail address listed in the Attorney Information System, logan@loganandjolly.com and on Larry C. Brandt and Andrew K. Holliday, counsel for Respondents, Globe, a South Carolina Limited Partnership, and Farnes, a South Carolina Limited Partnership, by email sent to their primary e-mail addresses listed in the Attorney Information System, lcb.brandtlawfirm@att.net and andrew@drwmlaw.com, on December 20, 2022. See attached email.

The undersigned also certifies that I have caused the Notice of Appeal to be served on the Clerk of Court for Oconee County, by depositing in the U.S. Mail, postage pre-paid at the following address:

Melissa C. Burton
Clerk of Court, Oconee County
PO Box 678
Walhalla, SC 29691-0678

/s/ David L. Paavola
Keith M. Babcock, SC Bar# 456
David L. Paavola, SC Bar# 100714
LEWIS BABCOCK L.L.P.
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Attorneys for Appellant

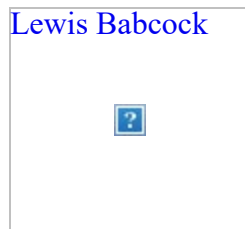
Columbia, SC
December 20, 2022

From: [David L. Paavola](#)
To: [Jim Logan](#); [Larry Brandt](#); andrew@drwmlaw.com
Cc: [David L. Paavola](#); [Keith M. Babcock](#); [Pat K. McCright](#)
Subject: John's Marine Service, Inc., et al. v. Oconee County Board of Zoning Appeals, et. al. - Notice of Appeal
Date: Tuesday, December 20, 2022 3:14:50 PM
Attachments: [20221220 Notice of Appeal.pdf](#)
[Exhibit 1.pdf](#)
[Exhibit 2.pdf](#)
[20221220 Proof of Service via US Mail on Ridgewater Engineering & Surveying LLC.pdf](#)
[20221220 Proof of Service Counsel of Record and Clerk of Court.pdf](#)

Jim, Larry, Andrew,

Attached is John's Marine's Notice of Appeal and Exhibits for service in accordance with Rule 203, SCACR. This notice will be filed in the Court shortly.

Sincerely,



David L. Paavola
Attorney

Lewis Babcock L.L.P.
1513 Hampton Street (29201)
PO Box 11208
Columbia, SC 29211

Main 803-771-8000
Direct 803-733-3512

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v.

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Respondents.

PROOF OF SERVICE

I certify that I have caused the service of the Notice of Appeal on the Respondent,
Ridgewater Engineering & Surveying, LLC, by depositing a copy in the U.S. Mail, postage pre-
paid, addressed as follows:

Ridgewater Engineering & Surveying LLC
211 Society Street
Anderson, South Carolina 29621

Columbia, SC
December 20, 2022

/s/ David L. Paavola
Keith M. Babcock, SC Bar# 456
David L. Paavola, SC Bar# 100714
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Attorneys for Appellant



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SC Court of Appeals

Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

Re: John's Marine Service, Inc., et al. v. Oconee County Board of Zoning
Appeals, et al.
Case No. 2022-CP-37-00396
Our File Number 22-107

Dear Ms. Kitchings:

Enclosed for filing please find a Notice of Appeal with exhibits and Proofs of Service in the above referenced matter. A check for the filing fee is being delivered via U.S. mail.

If you have any questions, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Paavola', written over a light blue horizontal line.

David L. Paavola

DLP:pkm
Enclosure

cc: James W. Logan, Jr., Esq., *via email*
logan@loganandjolly.com

Larry C. Brandt, Esq., *via email*
lcb.brandtlawfirm@att.net

Andrew K. Holliday, Esq., *via email*
andrew@drwmlaw.com

Melissa C. Burton, *via U.S. Mail*
Clerk of Court, Oconee County
PO Box 678
Walhalla, SC 29691-0678

Ridgewater Engineering & Surveying LLC, *via U.S. Mail*
211 Society Street
Anderson, South Carolina 29621