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Jan 05 2023
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

Case No. 2022-CP-10-02041

Craig W. Thomas,

Respondent,

v.

Town of Mount Pleasant and
Town of Mount Pleasant Historic District Preservation Commission,

Appellants.

NOTICE OF APPEAL

CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
Brian L. Quisenberry (SC Bar No. 73637)
Zachary M. Kern (SC Bar No. 103731)
Russell G. Hines (SC Bar No. 72100)
25 Calhoun Street, Suite 400
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(843) 720-5488

Attorneys for Appellants

Other Counsel of Record:

Charles J. Baker III (SC Bar No. 486)
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WOMBLE BOND DICKINSON (US) LLP
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Attorneys for Respondent
Craig W. Thomas

The Town of Mount Pleasant and Town of Mount Pleasant Historic District Preservation Commission ("Appellants") hereby appeal the following orders of the Honorable Bentley D. Price, Circuit Court Judge:

- Order [Reversing the Denial of Craig W. Thomas's Application for a Certificate of Appropriateness], filed November 1, 2022; and

- Order Denying Respondents' Town of Mount Pleasant and Town of Mount Pleasant Historic District Preservation Commission's Motion to Reconsider, filed December 6, 2022.

Copies of the appealed orders are attached hereto and incorporated herein by reference. Appellants received written notice of entry of the most recent order on December 6, 2022.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines

Stephen L. Brown (SC Bar No. 66468)
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Attorneys for Appellants

Charleston, South Carolina

January 5, 2023

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PROOF OF SERVICE

CLEMENT RIVERS, LLP
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Attorneys for Appellants

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Appellants, hereby certify that Appellants' **NOTICE OF APPEAL** was served on Respondent, Craig W. Thomas, on January 5, 2023, by emailing (see attached email) a copy of the same to his counsel of record:

Charles J. Baker III, Esquire
chuck.baker@wbd-us.com
Harriet Ward, Esquire
harriet.ward@wbd-us.com
WOMBLE BOND DICKINSON (US) LLP

Attorneys for Respondent
Craig W. Thomas

I also certify that a copy of this **NOTICE OF APPEAL** was this day, January 5, 2023, E-Filed with the lower court (see attached NEF), which also, i.e., in addition to service by email, effected service of the notice today on all counsel of record via the E-Filing System.

Respectfully submitted,

CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)

Attorneys for Appellants

Charleston, South Carolina

January 5, 2023

From:	Hines, Russell
To:	"chuck.baker@wbd-us.com"; "harriet.ward@wbd-us.com"
Cc:	"Brown, Steve"; Quisenberry, Brian; Kern, Zachary (Zach); Mantiply, Madison; Eversole, Amy R.; Justman, Aimee; Bell, Pollyana (Polly)
Subject:	Thomas v. Town of Mount Pleasant (Case No. 2022-CP-10-02041) -- Notice of Appeal
Date:	Thursday, January 5, 2023 2:31:13 PM
Attachments:	image001.png Thomas v. Town of Mount Pleasant -- Notice of Appeal.pdf Thomas v. Town of Mount Pleasant -- Appealed Order filed November 1, 2022.pdf Thomas v. Town of Mount Pleasant -- Appealed Order filed December 6, 2022.pdf

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Attached please find the Town of Mount Pleasant and Town of Mount Pleasant Historic District Preservation Commission's **Notice of Appeal** in the above-referenced matter and copies of the **Appealed Orders** referenced therein.

Russell G. Hines
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****** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2022CP1002041

Official File Stamp:	01-05-2023 02:38:26 PM
Court:	CIRCUIT COURT Common Pleas Charleston
Case Caption:	Craig W Thomas VS Mount Pleasant Town Of , defendant, et al
Event(s):	Notice/Notice of Appearance
Document(s) Submitted:	Appeal/Notice of Appeal to Court of Appeals - Exhibit/Filing of Exhibits - Exhibit/Filing of Exhibits
Filed by or on behalf of:	Russell Grainger Hines

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Charles J. Baker, III for Craig W Thomas
Brian Lee Quisenberry for Mount Pleasant Town Of et al
Zachary Meade Kern for Mount Pleasant Town Of et al

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means: