

**RECEIVED**

**Jan 03 2023**

**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' FINAL BRIEF** and **RESPONDENTS' CERTIFICATION OF FINAL BRIEF** were served on all other parties to this appeal on January 3, 2023, via email (see attached) to their following counsel of record:

Thomas J. Rode ([thomas@tktlawyers.com](mailto: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

January 3, 2023

## Bell, Pollyana (Polly)

---

**From:** Bell, Pollyana (Polly)  
**Sent:** Tuesday, January 3, 2023 10:40 AM  
**To:** scerone@tktlawyers.com; thomas@tktlawyers.com  
**Cc:** 'Stephen Brown (sbrown@ycrlaw.com)'; Quisenberry, Brian; Mantiply, Madison; Justman, Aimee; Hines, Russell  
**Subject:** Wolf Marie Vernon Trust v. Town of Mount Pleasant et al.; Appellate Case No. 2022-000392 (CR 210600)  
**Attachments:** Respondents' Final Brief.pdf; Certification for Final Brief.pdf

Good morning, enclosed please find Respondents' Final Brief and Certification which will be filed today in the above-referenced matter.

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 COUNSEL