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Jan 30 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
Edward R. Miller, Circuit Court Judge

Case No. 2022-CP-23-03356

Citizens for Quality Rural Living, Inc.,

Appellant,

v.

LyonJay and the Greenville County
Planning Commission,

Respondents.

NOTICE OF APPEAL

Appellant Citizens for Quality Rural Living, Inc. appeals the order of the Honorable Edward R. Miller affirming the Respondent Greenville County Planning Commission's approval of Respondent LyonJay's preliminary plan application, filed on November 4, 2022, as well as the Order Denying Appellant Citizens for Quality Rural Living, Inc.'s Motion to Reconsider, filed by the Honorable Edward R. Miller on January 18, 2023. Appellant received written notice of entry of this order on January 18, 2023.

January 30, 2023.

Respectfully submitted,

s/ Michael G. Martinez

Michael G. Martinez, Esq.

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Attorney for Appellant

Other Counsel of Record:

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Attorneys for the Greenville County Planning Commission

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William A. Neinast, Esq.
R. Taylor Speer, Esq.
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CERTIFICATE OF SERVICE

I, the undersigned, attorney for Appellant Citizens for Quality Rural Living Inc., do certify that I have this date, January 30, 2023, served the Notice of Appeal, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Order dated May 6, 2022, on the following counsel of record using the primary email addresses listed in the Attorney Information System:

Anne R. Culbreath, Esq.
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In accordance with the Supreme Court's Order regarding Methods of Electronic Filing and Service under Rule 262, SCACR, section (d)(1), a copy of the sent email is enclosed.

Respectfully submitted,

s/ Michael G. Martinez
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January 30, 2023

2022-CP-23-03356, Citizens for Quality Rural Living v. LyonJay & GCPC

From: [Michael Martinez <mike@scelp.org>](mailto:mike@scelp.org)
To: [Anne R. Culbreath <arculbreath@wjcblaw.com>](mailto:arculbreath@wjcblaw.com), arculbreath@wjlaw.net,
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Cc: [Debbie Weiner <debbie@scelp.org>](mailto:debbie@scelp.org)
Subject: 2022-CP-23-03356, Citizens for Quality Rural Living v. LyonJay & GCPC
Date: Monday, January 30, 2023 12:22 PM
Size: 105 KB

Dear Anne, Andrew, William, William, and Taylor,

Pursuant to Rule 262(c)(3), SCACR, and the Supreme Court's Order Regarding Methods of Electronic Filing and Service Dated May 6, 2022, I am writing to serve William B. Swent, William A. Neinast, and R. Taylor Speer as counsel of record for LyonJay with the Notice of Appeal in the above referenced case.

In addition, I am writing to serve Anne R. Culbreath and Andrew N. Price as counsel of record for the Greenville County Planning Commission with the Notice of Appeal in the above referenced case.

Citizens for Quality Rural Living, Inc. is hereby appealing Judge Miller's order denying its motion to reconsider and the underlying order affirming the Planning Commission's approval of LyonJay's preliminary plan for River Preserve. Please find attached the Notice of Appeal.

Thank you. Please do not hesitate to contact me with any questions or concerns.

Sincerely,

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Notice of Appeal.pdf 72 KB