

RECEIVED

Mar 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Case No. 2022-CP-26-02575

The Cottages at Garden City Beach, LP,Appellant,

v.

Murrells Inlet-Garden City Fire District,Respondent,

NOTICE OF APPEAL

The Cottages at Garden City Beach, LP, by and through its undersigned counsel, hereby appeals the final decision of the Murrells Inlet-Garden City Fire District dated March 28, 2022 and received March 28, 2022 (attached hereto as Exhibit A) *Order Affirming the Decision of the Murrells Inlet-Garden City Fire District* of the Honorable Kristi F. Curtis, filed December 9, 2022 (attached hereto as Exhibit B) and the *Order Denying Appellant's Motion for Reconsideration* of the Honorable Kristi F. Curtis, filed February 13, 2023 (attached hereto as Exhibit C).

BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.
P.O. Box 357
Myrtle Beach, SC 29578
(843)448-2400
dmiller@bellamylaw.com
zcrowl@bellamylaw.com
Attorneys for Appellant

s/ Zachary J. Crowl
David B. Miller, SC Bar #10296
Zachary J. Crowl, SC Bar #103617

Myrtle Beach, South Carolina
March 13, 2023

Other Counsel of Record:

Michael W. Battle, Esquire
Battle Law Firm, LLC
PO Box 530
Conway, SC 29528
(843)248-4321
mbattle@battlelawsc.com
Attorney for Respondent Murrells Inlet-Garden City
Fire District

RECEIVED

Mar 13 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Case No. 2022-CP-26-02575

The Cottages at Garden City Beach, LP,Appellant,

v.

Murrells Inlet-Garden City Fire District,Respondent,

PROOF OF SERVICE

I certify that I have served the Notice of Appeal to the following counsel of record by depositing a copy of it in the United States Mail, postage prepaid on March 13, 2023 and addressed as follows:

Michael W. Battle, Esquire
Battle Law Firm, LLC
PO Box 530
Conway, SC 29528
(843)248-4321
mbattle@battlelawsc.com
Attorney for Respondent

BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.
P.O. Box 357
Myrtle Beach, SC 29578
(843)448-2400
dmiller@bellamylaw.com
zcrowl@bellamylaw.com
Attorneys for Appellant

s/ Zachary J. Crowl

David B. Miller, SC Bar #10296

Zachary J. Crowl, SC Bar #103617

Myrtle Beach, South Carolina
March 13, 2023

HOWELL V. BELLAMY, JR.
EDWARD B. BOWERS, JR.*
M. EDWIN HINDS, JR.
DAVID B. MILLER+
C. WINFIELD JOHNSON, III
DOUGLAS M. ZAYICEK
MARTIN C. DAWSEY*
ROBERT S. SHELTON+
HOWELL V. BELLAMY, III
GEORGE W. REDMAN, III + ** ++
BENJAMIN A. BAROODY + ** ++

* LLM TAXATION
** LICENSED IN SC & NC
+ CERTIFIED MEDIATOR
++ CERTIFIED ARBITRATOR



THE
BELLAMY
LAW FIRM

OFFICES IN MYRTLE BEACH & PAWLEYS ISLAND

WWW.BELLAMYLAW.COM

PHILLIP H. ALBERGOTTI* **
HAYES K. STANTON + **
KARA J. KEITH **
HOLLY M. LUSK
LAUREN BREARLEY BENTON
JON CRAIG HOWELL, JR.
ZACHARY J. CROWL**
BRICE A. BERTSCHIN
ALLIE BARTH TILLER

RETIRED:
JOHN K. RUTENBERG (1939-2012)
JOHN E. COPELAND
CLAUDE M. EPPS, JR.
DAVID R. GRAVELY
JILL F. GRIFFITH
BRADLEY D. KING

1000 29TH AVENUE NORTH • P.O. BOX 357 • MYRTLE BEACH, SC 29578
TELEPHONE (843) 448-2400 • FACSIMILE (843) 448-3022

Writer's Direct Dial: 843-282-5398
Email: ZCrowl@BellamyLaw.com

March 13, 2023

VIA EMAIL & US MAIL

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

RECEIVED
Mar 13 2023
SC Court of Appeals

Re: The Cottages at Garden City Beach, LP, v. Murrells Inlet-Garden City Fire District
Horry County Case Number: 2022-CP-26-02575

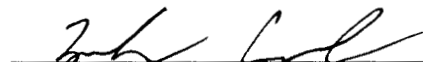
Dear Ms. Kitchings:

Regarding the above-referenced matter, enclosed please find a Notice of Appeal (with exhibits), Proof of Service, and this firm's check in the amount of \$250.00 for the filing fee.

Should you have any questions regarding the enclosed, please give me a call. Thank you for your assistance with this matter.

Very truly yours,

BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.


Zachary J. Crowl

cc: The Honorable Renee Elvis
Michael W. Battle, Esquire

DATE	DESCRIPTION	INVOICE #	CHECK		NET AMOUNT
			AMOUNT	DEDUCTION	
03/13/2023	SOUTH CAROLINA COURT OF APPEALS HORRY COUNTY-2022-CP-2602575	32	250.00		250.00

CHECK DATE	CONTROL NUMBER	TOTALS	Gross:	Ded:	Net:
03/13/2023	87937		250.00	0.00	250.00

BELLAMY, RUTENBERG, COPELAND, EPPS,
 GRAVELY & BOWERS, P.A., Attorneys at Law
 P.O. BOX 357
 MYRTLE BEACH, SOUTH CAROLINA 29578

BB&T
 MYRTLE BEACH, SOUTH CAROLINA
 67-160/532

87937

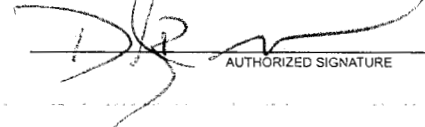
DATE: 03/13/2023 AMOUNT: *****\$250.00

PAY

*** TWO HUNDRED FIFTY & 00/100 DOLLARS

TO THE SOUTH CAROLINA COURT OF APPEALS
 ORDER
 OF:

BELLAMY, RUTENBERG, COPELAND, EPPS,
 GRAVELY & BOWERS - General Account


 AUTHORIZED SIGNATURE

MEMO: HORRY COUNTY-2022-CP-2602575

⑈087937⑈ ⑆053201607⑆ 141000021437⑈

Cam-Intv. features included. Details on bank.

HOWELL V. BELLAMY, JR.
EDWARD B. BOWERS, JR.*
M. EDWIN HINDS, JR.
DAVID B. MILLER⁺
C. WINFIELD JOHNSON, III
DOUGLAS M. ZAYICEK
MARTIN C. DAWSEY*
ROBERT S. SHELTON⁺
HOWELL V. BELLAMY, III
GEORGE W. REDMAN, III^{+ ** ++}
BENJAMIN A. BAROODY^{+ ***}

* LLM TAXATION
** LICENSED IN SC & NC
⁺ CERTIFIED MEDIATOR
⁺⁺ CERTIFIED ARBITRATOR



THE **BELLAMY**
LAW FIRM

OFFICES IN MYRTLE BEACH & PAWLEYS ISLAND

WWW.BELLAMYLAW.COM

PHILLIP H. ALBERGOTTI* **
HAYES K. STANTON⁺ **
KARA J. KEITH **
HOLLY M. LUSK
LAUREN BREARLEY BENTON
JON CRAIG HOWELL, JR.
ZACHARY J. CROWL**
BRICE A. BERTSCHIN
ALLIE BARTH TILLER

RETIRED:
JOHN K. RUTENBERG (1939-2012)
JOHN E. COPELAND
CLAUDE M. EPPS, JR.
DAVID R. GRAVELY
JILL F. GRIFFITH
BRADLEY D. KING

1000 29TH AVENUE NORTH • P.O. BOX 357 • MYRTLE BEACH, SC 29578
TELEPHONE (843) 448-2400 • FACSIMILE (843) 448-3022

Writer's Direct Dial: 843-282-5398
Email: ZCrowl@BellamyLaw.com

March 13, 2023

VIA E-FILING

The Honorable Renee Elvis
Horry County Clerk of Court
1301 Second Ave
Conway, SC 29526

Re: The Cottages at Garden City Beach, LP, v. Murrells Inlet-Garden City Fire District
Horry County Case Number: 2022-CP-26-02575

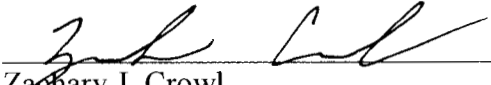
Dear Ms. Elvis:

Regarding the above-referenced matter, enclosed please find a Notice of Appeal (with exhibits) which has been filed with the South Carolina Court of Appeals. Copies have also been forwarded to all counsel of record.

Should you have any questions regarding the enclosed, please give me a call. Thank you for your assistance with this matter.

Very truly yours,

BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.



Zachary J. Crowl

cc: The Honorable Jenny Abott Kitchings
Michael W. Battle, Esquire