

FORM 1
NOTICE OF APPEAL IN A CIVIL CASE

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APR 17 2023

APPEAL FROM GEORGETOWN COUNTY SC Court of Appeals
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Case No. 2022-CP-22-00032

Ernest F. Middleton, III, and Joyce J.
Middleton, Michael J. Farrar and Diana
Farrar, Robert E. Hunt and Jeane M.
Sullivan, The Colony Homeowners
Association, Inc., and Keep It Green, Inc.,

Respondents,

v.

Georgetown County and Benjamin F.
Goff, Sr., Trustee of the Benjamin F.
Goff 2004 Revocable Trust, dated June
18, 2004


Defendants

Of whom Benjamin F. Goff, Sr., Trustee
of the Benjamin F. Goff 2004 Revocable
Trust, dated June 18, 2004 is the
Appellant.

NOTICE OF APPEAL

Benjamin F. Goff, Sr., Trustee appeals the order and decisions of the Honorable William H. Seals, Jr., dated, March 24, 2023. Appellant received written notice of entry of this order and decisions on April 3, 2023.

April 12, 2023


Benjamin F. Goff, Sr., Trustee
!8 Powers Farm Road
Randolph, Massachusetts 02368
(781) 986-0635
Pro Se for Appellant

Other Counsel of Record:
Cynthia Ranck Person
Post Office Box 1922
Pawleys Island, South Carolina 29585
Attorney for Respondents
(570) 971-8636

H. Thomas Morgan, Jr.
Post Office Drawer 39
Camden, South Carolina 29020
Attorney for Defendant Georgetown County
(803) 432-1992

Rachel E. Lee
2530 Devine Street, Third Floor
Columbia, South Carolina 29205
Attorney for Defendant Georgetown County
(803) 254-5007

**FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL**

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Steven H. John, Circuit Court Judge

RECEIVED

APR 17 2023

SC Court of Appeals

Case No. 2022-CP-22-00032

Ernest F. Middleton, III, and Joyce J. Middleton,
Michael J. Farrar and Diana Farrar, Robert E. Hunt
and Jeane M. Sullivan, The Colony Homeowners
Association, Inc., and Keep It Green, Inc., Respondents,

v.


Georgetown County and Benjamin F.
Goff, Sr., Trustee of the Benjamin F.
Goff 2004 Revocable Trust, dated June 18, 2004 Defendants

Of whom Benjamin F. Goff, Sr., Trustee
of the Benjamin F. Goff 2004 Revocable
Trust, dated June 18, 2004 is the
Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Georgetown County by depositing a copy of it in the United States Mail, postage prepaid, on April 12, 2023, addressed to their attorney of record, H. Thomas Morgan, Jr., Esq., Smith Robinson Holler Dubose Morgan, LLC, P.O. Drawer 39, Camden, SC 29021-0039.

April 12, 2023


Benjamin F. Goff, Sr.,
Trustee
18 Powers Farm Road
Randolph, Massachusetts 02368
(781) 986-0635
Pro Se for Appellants

FORM 7
PROOF OF SERVICE OF A NOTICE OF APPEAL

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Steven H. John, Circuit Court Judge

Case No. 2022-CP-22-00032

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SC Court of Appeals

Ernest F. Middleton, III, and Joyce J. Middleton,
Michael J. Farrar and Diana Farrar, Robert E. Hunt
and Jeane M. Sullivan, The Colony Homeowners
Association, Inc., and Keep It Green, Inc., Respondents,

v.


Georgetown County and Benjamin F.
Goff, Sr., Trustee of the Benjamin F.
Goff 2004 Revocable Trust, dated June 18, 2004 Defendants

Of whom Benjamin F. Goff, Sr., Trustee
of the Benjamin F. Goff 2004 Revocable
Trust, dated June 18, 2004 is the
Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Ernest F. Middleton, III, and Joyce J. Middleton, Michael J. Farrar and Diana Farrar, Robert E. Hunt and Jeane M. Sullivan, The Colony Homeowners Association, Inc., and Keep It Green, Inc., by depositing a copy of it in the United States Mail, postage prepaid, on April 12, 2023, addressed to their attorney of record, Cynthia Ranck Person, Keep It Green Advocacy, Inc., Post Office Box 1922, Pawleys Island, SC 29585.

April 12, 2023


Benjamin F. Goff, Sr.,
Trustee
18 Powers Farm Road
Randolph, Massachusetts 02368
(781) 986-0635
Pro Se for Appellants

FORM 8
LETTER TO THE APPELLATE COURT CLERK
FILING THE NOTICE OF APPEAL

April 12, 2023

RECEIVED

APR 17 2023

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

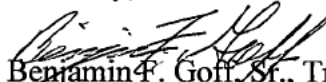
RE: Ernest F. Middleton, III, and Joyce J. Middleton, Michael J. Farrar and Diana Farrar, Robert E. Hunt and Jeane M. Sullivan, The Colony Homeowners Association, Inc., and Keep It Green, Inc., Respondents, v. Benjamin F. Goff, Sr., Trustee of the Benjamin F. Goff 2004 Revocable Trust, dated June 18, 2004, Appellant, Case No. 2022-CP-22-00032

Dear Ms. Kitchings:

Enclosed for filing is a notice of appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the notice of appeal on the respondents.
- (2) A copy of the order which is to be challenged on appeal.
- (3) A filing fee of \$250.

Sincerely,


Benjamin F. Goff, Sr., Trustee
18 Powers Farm Road
Randolph, Massachusetts 02368
(781) 986-0635
Pro Se for Appellant

cc: Cynthia Ranck Person, Esq.
Keep It Green Advocacy, Inc.
Post Office Box 1922
Pawleys Island, South Carolina 29585
(570) 971-8636
Attorney for Respondents

H. Thomas Morgan, Jr., Esq.
Smith Robinson Holler Dubose and
Morgan, LLC
Post Office Drawer 39
Camden, SC 29020
Attorney for Georgetown County



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Benjamin F. Goff, Sr., Trustee
 18 Powers Farm Road
 Randolph, MA 02368

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APR 17 2023

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
 Clerk, South Carolina Court of Appeals
 Post Office Box 11629
 Columbia, SC 29211

