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**May 12 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

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The Honorable Bentley D. Price

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Trial Court Case No.: 2022-CP-23-04704  
Appellate Case No. 2023-000699

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Marcelo Torricos, as Trustee of the John W.  
Beeson Irrevocable Trust II FBO James H.  
Beeson dated August 5, 2021 .....Respondent,

v.

The Greenville County Planning Commission .....Appellant.

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**NOTICE OF APPEARANCE**

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PLEASE TAKE NOTICE that Sarah P. Spruill hereby enters an appearance in the above-referenced appeal as counsel for Appellant, The Greenville County Planning Commission, and hereby authorizes you to enter such an appearance and to do all that is necessary in connection therewith. This appearance is in addition to that of Boyd B. Nicholson, Jr.

I respectfully request that all future filings, correspondence and other attorney or court communications be provided to the undersigned at the addresses below.

*(Signature Page Follows)*

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

*s/ Sarah P. Spruill*

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May 12, 2023  
Greenville, South Carolina

*Attorneys for Appellant Greenville County Planning  
Commission*

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**PROOF OF SERVICE**

I certify that I have served *Notice of Appearance for Sarah P. Spruill* and *Memorandum of Appealability* on counsel of record on this the 12th day of May, 2023, by electronic mail only to the following:

Bruce W. Bannister, Esq.  
Luke Anthony Burke, Esq.  
Marcelo Torricos III, Esq.  
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*Stacey Carberry*

Stacey Carberry, Legal Assistant  
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SC Court of Appeals

HAYNSWORTH  
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May 12, 2023

**VIA EMAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

Re: *Marcelo Torricos, as Trustee of the John W. Beeson Irrevocable Trust II FBO James H. Beeson dated August 5, 2021 v. The Greenville County Planning Commission*  
Appellate Case No. 2023-000699

Dear Ms. Kitchings:

This firm represents the Appellant, The Greenville County Planning Commission, in the above matter. Enclosed for filing, please find a *Notice of Appearance for Sarah P. Spruill* and *Memorandum of Appealability* together with our Proof of Service for the same.

Counsel for the Appellant has ordered and received the transcript; however, we understand from the Court's letter of May 2, 2023 that the deadlines in this matter have been held in abeyance pending the Court's consideration of the memoranda on appealability. For that reason, we have not yet calendared our initial brief and designation. Please let me know if that is incorrect.

If you have any questions, please give me a call. Thank you for your assistance in this matter.

Sincerely,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/sac

Enclosures

cc: Bruce W. Bannister, Esq. (bbannister@bannisterwyatt.com)  
Luke Anthony Burke, Esq. (lburke@bannisterwyatt.com)  
Marcelo Torricos III, Esq. (mtorricos@bannisterwyatt.com)