

**THE STATE OF SOUTH CAROLINA**

**In the Supreme Court**

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APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Hon. Eugene Griffith

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Case No. 2018-CP-10-851

Appeal No. 2023-930

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**RECEIVED**

**Jul 18 2023**

**S.C. SUPREME COURT**

National Trust for Historic Preservation  
In the United States and The City of Charleston, Respondents/Appellants

v.

City of North Charleston, Appellant / Respondent.

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**City of North Charleston's Return to  
City of Charleston Petition for Certiorari**

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Derk Van Raalte, Kris Neely  
Brady Hair  
Legal Dept., 2500 City Hall Lane  
North Charleston, SC 29406  
843-740-2550  
[dvanraalte@northcharleston.org](mailto:dvanraalte@northcharleston.org)  
[kneely@northcharleston.org](mailto:kneely@northcharleston.org)  
[brady@bradyhair.com](mailto:brady@bradyhair.com)  
Attorneys: City of North Charleston

Other Counsel of Record:  
Francis Cantwell, Esquire  
2220 Folly Road  
Charleston, SC 29412  
[Fcantwell054@gmail.com](mailto:Fcantwell054@gmail.com)

Russell Hines, Esquire  
Wilbur Johnson, Esquire  
Clement Rivers Law Firm  
25 Calhoun Street, Suite 400  
Charleston, SC 29402

Julia Parker Copeland, Esquire  
City of Charleston Legal Dept.  
50 Broad Street  
Charleston, SC 29401

Trenholm Walker, Esquire  
Walker, Gressette, Freeman, Linton  
PO Box 22167  
Charleston, SC 29413  
[walker@WGFLAW.com](mailto:walker@WGFLAW.com)

843-727-2208  
Attorney for National Trust

Attorneys for the City of Charleston

# **City of North Charleston’s Return to City of Charleston Petition for Certiorari**

As is the case here, the issues and arguments presented to the Court of Appeals below by the City of Charleston and the National Trust (collectively, “Petitioners”) were highly similar. In response the City of North Charleston below filed a single “combined” final brief to avoid wasting the court’s limited time with two highly overlapping response briefs. Similarly, in response to Charleston’s Petition for Certiorari the City of North Charleston wishes to rely on North Charleston’s filed Response to the companion National Trust’s Petition with the understanding that the arguments presented in that Response are equally intended to rebut the City of Charleston’s Petition here.<sup>1</sup> North Charleston believes this honors the spirit of SCAR 242(h) “Consolidation”, but should the Court wish North Charleston to refile a full length Response document the City will happily do so.

This 18<sup>th</sup> day of July, 2023



Derk Van Raalte,  
Kris Neely,  
Brady Hair  
City of North Charleston  
2500 City Hall Lane  
North Charleston, SC 29406  
843-740-2550  
[kneely@northcharleston.org](mailto:kneely@northcharleston.org)  
[dvanraalte@northcharleston.org](mailto:dvanraalte@northcharleston.org)  
[brady@bradyhair.com](mailto:brady@bradyhair.com)

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<sup>1</sup> Much of the City of Charleston’s Petition for Cert. is a nearly paragraph-by-paragraph repeat of its Court of Appeals briefing, thus making North Charleston’s combined response approach as appropriate here as it was before the Court of Appeals.