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Jul 18 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In the Supreme Court

APPEAL FROM CHARLESTON COUNTY

Court of Common Pleas

Hon. Eugene Griffith

Case No. 2018-CP-10-851

Appeal No. 2023-930

National Trust for Historic Preservation

In the United States and The City of Charleston, Respondents/Appellants

v.

City of North Charleston,

Appellant / Respondent.

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

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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.¹ 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 18th day of July, 2023



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¹ 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.

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Certificate of Service for Return to City of Charleston Petition for Rehearing

Certificate of Service

I certify that I have served the Appellants and the Clerk of Court either electronically a copy of the following documents:

Return to Petition for Certiorari by City of Charleston

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This 18th of July, 2023



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Subject: Nat Trust and City of Chas v. N Charleston - North Charleston Return to Charleston Petition for Cert Appeal 2023-930
Attachments: N Chas POS re Return to Chas Pet for Cert.pdf; N Chas Return to Chas Pet for Cert.pdf

Please find attached for filing the City of North Charleston's Return to the City of Charleston Petition as well as proof of service. Thank you.

Derk Van Raalte
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