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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2023-001006

Justin O'Toole Lucey, Appellant,

v.

The Town of Mount Pleasant, South Carolina, and
WIN515, LLC, Respondents.

PROOF OF SERVICE

I certify that I have served Appellant's Initial Brief and Designation of Matter to be Included in the Record on the above-named Respondents via email (see attached email) to their respective counsel of record, on November 15, 2023, containing the above-referenced documents as attachments in .pdf, sent to the addresses shown below.

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Respectfully submitted,

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COUNSEL FOR APPELLANT

November 15, 2023

Archived: Wednesday, November 15, 2023 4:40:56 PM

From: [Jeff Tibbals](#)

Sent: Wed, 15 Nov 2023 21:39:32

To: [Quisenberry, Brian](#) zkern@ycrlaw.com ross@mklawsc.com

Cc: [Evan Williams](#) [Elliott Jones](#) [Whitney Moore](#) liz@mklawsc.com

Subject: 2023-001006 - Justin O' Toole Lucey v. Town of Mount Pleasant and WIN515,LLC

Importance: Normal

Sensitivity: None

Attachments:

[2023.11.15_Initial Brief of Appellant_2023-001006.pdf](#)  [2023.11.15_Appellant's Designation of Matter_2023-001006.pdf](#) 

Dear Counsel,

Please find attached, for service in Appellate Case No. 2023-001006, the following documents:

1. Initial Brief of Appellant; and
2. Appellant's Designation of Matter to be Included in the Record on Appeal.

Thank you.

Jeffrey S. Tibbals

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November 15, 2023

VIA E-MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

**Re: *Justin O' Toole Lucey v. The Town of Mount Pleasant, South Carolina, and
WIN515, LLC***
Appellate Case No. 2023-001006

Dear Ms. Kitchings:

Please find enclosed for filing, on behalf of Appellant Justin O' Toole Lucey ("Appellant"), the following documents in the above-captioned matter:

1. Initial Brief of Appellant;
2. Appellant's Designation of Matter to be Included in the Record on Appeal; and
3. Proof of Service of the Initial Brief of Appellant and Appellant's Designation of Matter.

By copy of its counsel of record on the filing transmittal e-mail, Respondent and Intervenor/Respondents are served with Appellant's Initial Brief and Designation of Matter.

Yours Sincerely,



Jeffrey S. Tibbals

JST/wbm

Enclosures

cc (via e-mail only): Ross A. Appel, Esq.
Brian L. Quisenberry, Esq.
Zachary M. Kern, Esq.