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**Feb 16 2024**

**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

Case No. 2022-CP-10-03328  
Appellate Case No. 2023-001006

Justin O'Toole Lucey,

Appellant,

v.

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

Respondents.

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I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Respondent Town of Mount Pleasant, South Carolina, hereby certify that the **INITIAL BRIEF OF RESPONDENTS and RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL** were served on all other parties to this matter on February 15, 2024, by emailing (see attached email) a copy of the same to their counsel of record:

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February 15, 2024

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**Subject:** Justin O'Toole Lucey v. The Town of Mount Pleasant- 2023-001006 -- Initial Brief of Respondents  
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[Lucey v. Mount Pleasant \(2023-001006\) -- Initial Brief of Respondents.pdf](#)  
[Lucey v. Mount Pleasant \(2023-001006\) -- Respondents' Designation of Matter.pdf](#)

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Attached please find the **Initial Brief of Respondents** and **Respondents' Designation**.

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