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SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable William H. Seals, Jr.
Circuit Court Judge

Civil Action No. 2022-CP-22-00032

Appellate Case No. 2023-000615

Ernest F. Middleton, III, and Joyce J. Middleton, Michael J. Farrar and Diana Farrar, Robert H. Hunt and Jeane M. Sullivan, the Colony Homeowners Association, Inc., and Keep It Green, Inc.,.....Respondent,

v.

Georgetown County and Benjamin F. Goff, Sr., Trustee of the Benjamin F. Goff 2004 Revocable Trust dated June 18, 2004.,.....Defendants,

Of which Benjamin F. Goff, Sr., Trustee of the Benjamin F. Goff 2004 Revocable Trust dated June 18, 2004, is the Appellant and Georgetown County is a Respondent.

NOTICE OF APPEARANCE

H. Thomas Morgan, Jr. and Sydney J. Douglas hereby enter Notices of Appearance as appellate co-counsel along with Rachel E. Lee, on behalf of Georgetown County in Appellate Case No. 2023-000615. Please include the above-mentioned counsel on all future correspondence and appellate filings.

(signature page to follow)

SMITH | ROBINSON

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February 20, 2024

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PROOF OF SERVICE

I, the undersigned paralegal of the law offices of Smith Robinson Holler DuBose and Morgan, LLC, do hereby certify that on February 20, 2024, I have served all counsel in this action with a copy of the pleading(s) hereinbelow in accordance with the Supreme Court's Administrative Order by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System and by mailing a copy via U.S Mail on February 20, 2024, to each pro se party listed below.

Document Served: Notice of Appearance

Counsel Served: Via E-Mail Only
Cynthia Ranck Person, Esq.
kig.advocacy@gmail.com
Keep It Green Advocacy, Inc.

Attorney for Respondent

Pro Se Served: Via U.S. Mail Only
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Randolph, MA 02368

Pro Se Appellant

SMITH | ROBINSON
Smith Robinson Holler DuBose and Morgan, LLC



Sherry Roth
935 Broad Street
Camden, SC 29021
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**FOR RESPONDENT GEORGETOWN
COUNTY**

Camden, South Carolina

February 20, 2024

Sherry Roth

From: Sherry Roth
Sent: Tuesday, February 20, 2024 3:32 PM
To: KIG Advocacy
Cc: Tommy Morgan; Sydney Douglas; Rachel Lee
Subject: Middleton et al., v Georgetown, et al., (Appellate Case No. 2023-000615)
Attachments: NoA.pdf; PoS for NoA.pdf

Good afternoon, Cindy.

Attached please find the Notice of Appearance and Proof of Service in Middleton v Georgetown County Appellate Case No. 2023-000615, which we are electronically filing with the Court of Appeals tomorrow, served on you pursuant to Rule 262(c)(3) of the South Carolina Appellate Court Rules and section (d) of the South Carolina Supreme Court's August 25, 2021, Order discussing methods of electronic filing and service.

If you have any questions, please let us know.

Thank you,
Sherry

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