

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge

Case No. 2022-CP-18-00859

Town of Summerville,

Respondent,

v.

Clarence B. Brown, et al.

Of Whom

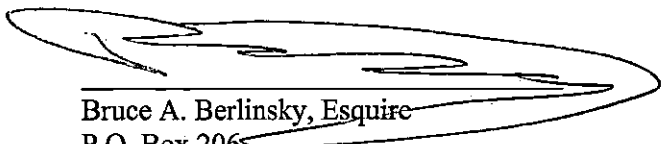
Thomas A. Limehouse

Appellant.

NOTICE OF APPEAL

Thomas A. Limehouse appeals the Order denying Defendant Thomas A. Limehouse's Motion to Intervene of the Honorable Diane Schafer Goodstein dated March 4, 2024 and filed March 4, 2024. Appellant received electronic notice of entry of this order denying Defendant Thomas A. Limehouse's Motion to Intervene on March 4, 2024.

April 1, 2024



Bruce A. Berlinsky, Esquire
P.O. Box 206
Charleston, SC 29402
Phone# 843-852-2202
Attorney for Appellant
Other Counsel of Record:

Richard D. Bybee, Esquire
Bybee & Tibbals, LLC
880 Johnnie Dodds Blvd. Suite 2
Mt. Pleasant, SC 29464
843-881-1623
Attorney for Respondent

101396
RECEIVED
APR 02 2024
SC Court of Appeals

G. Waring Parker, Esquire
200 South Main Street
Summerville, SC 29483
843-821-7323
Attorney for Respondent

Evan Patrick Williams, Esquire
Bybee & Tibbals, LLC
880 Johnnie Dodds Blvd. Suite 2
Mt. Pleasant, SC 29464
843-881-1623
Attorney for Respondent

Gil Gatch, Esquire
P.O. Box 2160
Summerville, SC 29484
843-800-2020
Attorney for Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Diane Schafer Goodstein, Circuit Court Judge

Case No. 2022-CP-18-00859

RECEIVED

APR 02 2024

SC Court of Appeals

Town of Summerville,

Respondent,

v.

Clarence B. Brown, et al.

Of Whom

Thomas A. Limehouse

Appellant.

PROOF OF SERVICE

I, Jessica Reynolds, legal assistant to Bruce A. Berlinsky, Esquire, do hereby certify that I have this date mailed a true and correct copy of the foregoing and **NOTICE OF APPEAL**, postage prepaid, and deposited with the United States Postal Service as follows:

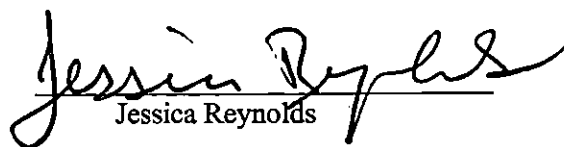
Richard D. Bybee, Esquire
Bybee & Tibbals, LLC
880 Johnnie Dodds Blvd. Suite 2
Mt. Pleasant, SC 29464
Attorney for Respondent

G. Waring Parker, Esquire
200 South Main Street
Summerville, SC 29483
Attorney for Respondent

Evan Patrick Williams, Esquire
Bybee & Tibbals, LLC
880 Johnnie Dodds Blvd. Suite 2
Mt. Pleasant, SC 29464
Attorney for Respondent

Gil Gatch, Esquire
P.O. Box 2160
Summerville, SC 29484
Attorney for Appellant

Dated this 15th day of April, 2024.



Jessica Reynolds

BRUCE A. BERLINSKY, P.A.
Attorney at Law

Mailing Address:
PO Box 206
Charleston, SC 29402

One Carriage Lane, Building F
Charleston, SC 29407

Office: (843) 852-2202
Fax: (843) 852-4844
Bruce@berlinskylawfirm.com

April 1, 2024

RECEIVED

APR 02 2024

SC Court of Appeals

VIA FEDEX DELIVERY
SC Court of Appeals
Jenny Abbott Kitchings
Clerk of Court
1220 Senate St.
Columbia, SC 29201

Re: Town of Summerville vs. Clarence B. Brown, et al.
Case No.: 2022-CP-18-00859

Dear Clerk Kitchings:

In connection with the above referenced matter, enclosed please find one (1) original and one (1) copy of **Notice of Appeal and Proof of Service** for filing, along with check in the amount of \$250.00 for filing fee. Please return the filed copies to us in the enclosed, postage-paid envelope.

Thanking you in advance for your assistance in this matter.

With kind regards, I am

Sincerely,



Bruce A. Berlinsky

BAB/jlr
Enclosures

cc: Dorchester County Clerk of Court
Richard D. Bybee, Esquire
G. Waring Parker, Esquire
Evan Patrick Williams, Esquire
Gil Gatch, Esquire

ORIGIN ID:RBWA (843) 852-2202
BRUCE BERLINSKY
BRUCE A. BERLINSKY, PA
ONE CARRIAGE LANE, BUILDING F
CHARLESTON, SC 29407
UNITED STATES US

SHIP DATE: 01APR24
ACTWGT: 1.00 LB
CAD: 3050098/INET4535
BILL SENDER

TO JENNY ABBOTT KITCHINGS, CLERK
SC COURT OF APPEALS
1220 SENATE STREET

583J46D809AE3

COLUMBIA SC 29201

(803) 734-1890 REF: FILE # 22-067
INV: DEPT:
PO:

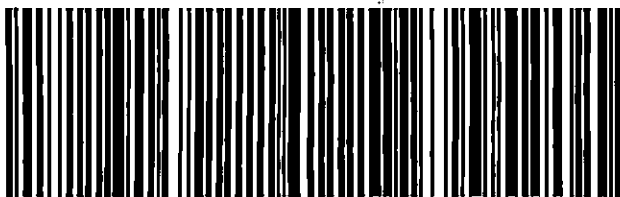


TUE - 02 APR 10:30A
PRIORITY OVERNIGHT

TRK# 7757 6884 8021
0201

28 USCA

29201
SC-US CAE



RECEIVED

APR 02 2024

SC Court of Appeals

After printing this label:
CONSIGNEE COPY - PLEASE PLACE IN FRONT OF POUCH
1. Fold the printed page along the horizontal line.
2. Place label in shipping pouch and affix it to your shipment.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.