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**Apr 12 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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The Honorable Robert Lawrence Reibold  
Beaufort County  
Trial Court Case No. 2022ALJ070033CC

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APPELLATE CASE NO. 2023-001592

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William P. Scurry and J & W Corporation of Greenwood,

Appellants,

v.

South Carolina Department of Health and Environmental Control and Simmons Family Holdings, LLC,

Respondents.

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PROOF OF SERVICE

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I hereby certify that this law firm represents the Appellants in the above-captioned matter and that on the date below, in Bluffton, South Carolina, a copy of the enclosed Appellants William P. Scurry and J & W Corporation of Greenwood's Initial Brief and Designation Of Matter To Be Included On Appeal were served upon the following persons via electronic mail to their AIS e-mail addresses:

**Documents Served:**

**INITIAL BRIEF OF APPELLANT and  
DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

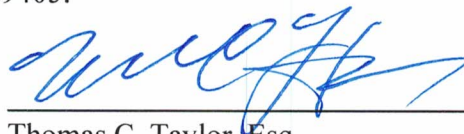
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*Counsel for the South Carolina Department of Health and Environmental Control*

Additionally, I hereby certify that a copy of same was deposited in the United States Mail on this date, with sufficient First-Class postage pre-paid, addressed to Mr. Traynham, Esq., at 1230 Main Street, Suite 700, Columbia, SC 29201, and to Mr. Churdar, Esq., at 1362 McMillan Ave., Suite 400, Charleston, SC 29405.



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April 12, 2024

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April 12, 2024

**Via First Class U.S. Mail and E-Mail Transmittal**

Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**Re: William P. Scurry And J & W Corporation Of Greenwood V. SCDHEC And  
Simmons Family Holdings, LLC; Appellate Case No. 2023-001592**

Dear Clerk Kitchings:

I represent the Appellants William P. Scurry And J & W Corporation Of Greenwood in this matter. It is my pleasure to enclose herein for filing pursuant to the South Carolina Appellate Court Rules, the following:

- a. Initial Brief of the Appellants;
- b. Appellants' Designation Of Matter To Be Included In The Record On Appeal; and,
- c. A Proof of Service.

Please advise me if you have any questions. Thank you.

Yours very truly,



Thomas C. Taylor

TCT/dpt

Enclosures

cc: Bradley Churdar, Esq., via e-mail transmittal  
Michael Smoak Traynham, Esq., via e-mail transmittal  
Mr. William P. Scurry, via e-mail transmittal