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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Marion County
Court of Common Pleas

The Honorable H. Steven DeBerry, IV, Circuit Court Judge 2771

Appellate Case No. 2024-000868
Civil Action No. 2023-CP-33-00500

Thomas Betancourt, Nicole Betancourt, Jimmy Boatwright, Arnie Boatwright, Norman Whetzel and
Kristana Whetzel.....Appellants,

v.

City of Mullins Zoning Board, Dr. Todd Blevins and Blevins Dentistry.....Respondents.

NOTICE OF APPEARANCE

The law firm of Turner, Padget, Graham & Laney, P.A., hereby gives notice that J. Rene' Josey, Esq. is appearing as appellate counsel of record on behalf of Respondents Dr. Todd Blevins and Blevins Dentistry, together with Attorney Hampton G. Tiller of Mullins, South Carolina. Please send all future notices and correspondence concerning this matter to the attention the counsel listed below at the addresses provided.

June 4, 2024

Florence, South Carolina

By: /s/ J. Rene Josey

J. Rene' Josey (Bar No. 03230)
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ATTORNEYS FOR RESPONDENTS
DR. TODD BLEVINS AND BLEVINS
DENTISTRY

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v.

City of Mullins Zoning Board, Dr. Todd Blevins and Blevins Dentistry.....Respondents.

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court’s Order Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended May 6, 2022), the undersigned employee of Turner, Padgett, Graham & Laney, P.A., counsel for the Respondents Dr. Todd Blevins and Blevins Dentistry, does hereby certify that service of the Notice of Appearance in the above-captioned matter was made upon all counsel of record by US Mail and/or E-mail on this 4th day of June, 2024:

Nicole Betancourt
618 S. Main Street
Mullins, SC 29574
Pro Se Appellant

Thomas Betancourt
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Jimmy Boatwright
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/s/ Jon Rene Josey, Esquire

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Turner Padget

SC Court of Appeals

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June 4, 2024

VIA EMAIL ONLY (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings

Clerk of Court

South Carolina Court of Appeals

Re: Thomas Betancourt, Nicole Betancourt, Jimmy Boatwright, Arnie Boatwright, Norman Whetzle and Kristana Whetzel v. City of Mullins Zoning Board, Dr. Todd Blevins and Blevins Dentistry
SCCA Action No.: 2024-000868
Civil Action No.: 2023-CP-33-00500
TPGL File No.: 18280.101

Dear Ms. Kitchings:

Pursuant to Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing my Notice of Appearance and Certificate of Service in the above-referenced matter. In accordance with Section (d)(1) of this same Order, I am hereby serving copies on all counsel of record. As well, please note that I am serving all Pro Se Appellants by US Mail.

If you have any questions, please advise.

Sincerely,

TURNER PADGET GRAHAM AND LANEY P.A.

/s/ J. Rene Josey

J. René Josey, Esquire

JRJ:alb/Enclosures

cc: Nicole Betancourt (via US Mail) (w/ enc)
Thomas Betancourt (via US Mail) (w/ enc)
Jimmy Boatwright (via US Mail) (w/ enc)



Letter to South Carolina Court of Appeals

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Arnie Boatwright (via US Mail) (w/ enc)
Norman Whetzel (via US Mail) (w/ enc)
Kristana Whetzel (via US Mail) (w/ enc)
Hampton Grainger Tiller, Esq. (via E-Mail) (w/ enc)
John Paul "JP" Williams, Jr., Esq. (via E-Mail) (w/ enc)