

**From:** [Barry Stanton](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [Will Dillard](#)  
**Subject:** RE: Final Appls. Brf. and Reply Brf.: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)  
**Date:** Wednesday, June 26, 2024 1:45:37 PM  
**Attachments:** [6-26-24 Appendix to Record on Appeal - Ch II Fee Appeal 2023 - Sunset v TOP - pp 953-965.pdf](#)

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**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Ms. Kitchings:

We attach and file by stipulation, an Appendix to the Record on Appeal, including certificate of service.

Best,

Barry Stanton

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**From:** Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Sent:** Wednesday, June 26, 2024 8:28 AM  
**To:** Barry Stanton <bstanton@stantonlaw.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>  
**Cc:** Will Dillard <will@belsarpa.com>  
**Subject:** RE: Final Appls. Brf. and Reply Brf.: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>  
**Sent:** Tuesday, June 25, 2024 6:00 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** Will Dillard <[will@belsarpa.com](mailto:will@belsarpa.com)>  
**Subject:** RE: Final Appls. Brf. and Reply Brf.: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Ms. Kitchings:

I have looked into the missing items referenced in Mr. Dillard's letter of today, June 25, and

he is correct. We will file by consent, a supplement to the Record, including the two items, which were an exhibit to the Town's answer to an amended complaint (namely, a notice of abandonment), and a 7/2/21 notice of appeal.

Best regards,

Barry Stanton

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**From:** Will Dillard <[will@belserpa.com](mailto:will@belserpa.com)>

**Sent:** Tuesday, June 25, 2024 5:24 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>; Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>

**Subject:** RE: Final Applt. Brf. and Reply Brf.: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

Good afternoon:

Please find attached for filing the *Final Brief of Respondent* (with *Certificate of Counsel* and *Proof of Service* attached) and a cover letter regarding the same.

Thank you,

Will Dillard

**William C. Dillard, Jr., Esquire**  
1325 Park Street, Suite 300 (29201)  
Post Office Box 96, Columbia, SC 29202  
Phone: (803) 929-0096, Fax: (803) 929-0196  
Direct: (803) 999-1255  
[will@belserpa.com](mailto:will@belserpa.com)

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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Sent:** Tuesday, June 25, 2024 8:40 AM

**To:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** Will Dillard <[will@belserpa.com](mailto:will@belserpa.com)>

**Subject:** RE: Final Applt. Brf. and Reply Brf.: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>  
**Sent:** Monday, June 24, 2024 7:30 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)  
**Subject:** Final Appls. Brf. and Reply Brf.: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Ms. Allen:

Attached and hereby filed and served are the Appellants' Brief and Appellants' Reply Brief.

Thank you for your assistance.

Best,

Barry Stanton

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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Sent:** Wednesday, June 5, 2024 1:42 PM  
**To:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)  
**Subject:** RE: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>  
**Sent:** Wednesday, June 5, 2024 1:12 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)  
**Subject:** RE: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

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3 of 3  
Volume III.

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**From:** Barry Stanton

**Sent:** Wednesday, June 5, 2024 1:07 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)

**Subject:** RE: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

2 of 3  
Volume II.

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**From:** Barry Stanton

**Sent:** Wednesday, June 5, 2024 1:04 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)

**Subject:** RE: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

1 of 3  
Dear Ms. Allen:

We attach and hereby file and serve, Volume I of III of the Record on Appeal. In two successive e-mails, we will similarly transmit Volumes II and III, so as to avoid any complications with large file size.

We will also drop off a set of unbound hard copies to the Court.

Thank you for your assistance.

Best,

Barry Stanton

M. Baron ("Barry") Stanton

STANTON LAW OFFICES, P.A.

Cell 803-530-2642

Offc. 803-929-1484

POB 245

Cola., SC 29202

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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Sent:** Tuesday, May 7, 2024 3:50 PM

**To:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)

**Subject:** RE: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>

**Sent:** Tuesday, May 7, 2024 3:38 PM

**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)

**Subject:** RE: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Ms. Allen:

We respectfully request a second extension of an additional 30 days in which to serve the record on appeal.

The current deadline would have been tomorrow, Wednesday, May 8, 2024.

The requested deadline would be Friday, June 7, 2024.

We have continued to have a prodigious load of professional, business and personal matters affect the schedule. Please let me know if any more formal application is needed.

In accordance with current practice, we will send the \$50 filing fee within 5 days to:

Clerk, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Thanks for your assistance.

Best,

Barry Stanton

M. Baron (“Barry”) Stanton  
STANTON LAW OFFICES, P.A.  
Cell 803-530-2642  
Offc. 803-929-1484  
POB 245  
Cola., SC 29202

---

**From:** Barry Stanton  
**Sent:** Monday, April 8, 2024 7:42 AM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)  
**Subject:** Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeals)

Dear Ms. Allen:

We respectfully request an extension of an additional 30 days in which to serve the record on appeal.

The current deadline would have been today, Monday, April 8, 2024. The requested deadline would be Wednesday, May 8, 2024.

Please let me know if any more formal application is needed.

In accordance with current practice, we will send the \$50 filing fee within 5 days to:

Clerk, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Thanks for your assistance.

Best,  
Barry Stanton

M. Baron (“Barry”) Stanton  
STANTON LAW OFFICES, P.A.  
Cell 803-530-2642  
Offc. 803-929-1484  
POB 245  
Cola., SC 29202

Barry

803 530 2642

----- Original message -----

From: Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>

Date: 3/7/24 3:27 PM (GMT-05:00)

To: Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

Cc: [will@belsarpa.com](mailto:will@belsarpa.com)

Subject: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272) (Challenge II fee appeal)

Dear Ms. Allen:

Attached and hereby filed are the Initial Appellants' Reply Brief and the Appellants' Second Designation (on Reply) of Matter to be Included in the Record on Appeal.

Thank you for your assistance.

Best,

Barry Stanton

M. Baron ("Barry") Stanton

STANTON LAW OFFICES, P.A.

Cell 803-530-2642

Offc. 803-929-1484

POB 245

Cola., SC 29202

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**From:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Sent:** Wednesday, February 28, 2024 8:32 AM

**To:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>; Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>

**Cc:** [will@belsarpa.com](mailto:will@belsarpa.com)

**Subject:** RE: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272)

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

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**From:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>  
**Sent:** Tuesday, February 27, 2024 10:03 PM  
**To:** Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>  
**Cc:** [will@belserpa.com](mailto:will@belserpa.com)  
**Subject:** RE: Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272)

**\*\*\* EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. \*\*\*

Dear Ms. Allen:

We respectfully request a third extension of an additional 15 days in which to file and serve the initial Appellants' Reply Brief and any reply designations.

The current deadline would have been today, Tuesday February 27, 2024. The requested deadline would be Wednesday, March 13, 2024.

In light of the hour being after 9:00 p.m., I have not checked to see if Mr. Dillard, opposing counsel, consents. We need more time to finish reducing the arguments, editing, checking citations, building tables, etc. and have been held back by an extraordinary schedule for an extraordinary length of time and numerous other matters.

I do not mean to go into detail, unless required, but do not take the extensions lightly. A small federal case full of complicated corporate transactions and parties in multiple states was expected to settle in the recent mediation but did not and is in final-stretch trial preparation with various submission deadlines, and we had to stop and file a case for a client with a large injury case with a statute of limitations looming. I have also had to give rapid attention to investigation and recovery for a party with an embezzlement situation. It may not sound as weighty as a large case or deal, but we have a young puppy which seems about as distracting as caring for an infant, except it is highly ambulatory, has fangs, and the mistakes are on floors and rugs. I thought I would get the brief and designation in tonight, but it does not look like I will quite make it, and I have a vision problem near my retina (which I have recently had checked out, but need to go back and get re-done glasses as help for) which causes headaches from merging distortion and a larger image in one eye from a different cause, and requires me to stop.

I do not know that I will need the full 15 days, but have things up tomorrow and have to get on a plane the following day.

Please let me know if any more formal application is needed.

In accordance with current practice, we will send the \$50 filing fee within 5 days to:

Clerk, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Thanks for your assistance.

Best,  
Barry Stanton

M. Baron ("Barry") Stanton

STANTON LAW OFFICES, P.A.  
Cell 803-530-2642  
Offc. 803-929-1484  
POB 245  
Cola., SC 29202

---

**From:** Singleton, Mary C. <[msingleton@sccourts.org](mailto:msingleton@sccourts.org)>  
**Sent:** Friday, February 16, 2024 1:08 PM  
**To:** Barry Stanton <[bstanton@stantonlaw.com](mailto:bstanton@stantonlaw.com)>; [will@belserpa.com](mailto:will@belserpa.com);  
[norwooddurant@lawofficesofdurant.com](mailto:norwooddurant@lawofficesofdurant.com); [ddurant@lawofficesofdurant.com](mailto:ddurant@lawofficesofdurant.com)  
**Cc:** [kristy@belserpa.com](mailto:kristy@belserpa.com); [litigation@lawofficesofdurant.com](mailto:litigation@lawofficesofdurant.com)  
**Subject:** Sunset Lodge, LLC v. Town of Pawleys Island (3) (2023-001272)

Dear Counsel:

Attached please find correspondence from the Court of Appeals. Any parties not included in this email will receive the attached correspondent US Mail.

**Do not respond to this email. Send all correspondence to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).**

Sincerely,

**Mary-Caitlyn Singleton**  
Senior Appeals Specialist  
SC Court of Appeals  
1220 Senate St.  
Columbia, SC 29201  
Ph: (803) 734-1890  
F: (803) 734-1839  
E-Filing Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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