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Jul 15 2024

SC Court of Appeals

Turner Padget

J. René Josey, Esquire

REPLY TO  
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July 15, 2024

**VIA EMAIL ONLY (ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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:

I am writing with concerns regarding the above-referenced matter. As the Clerk's office noted in its letter of May 30, 2024 to *pro se* Appellant Nichole Betancourt, the original Notice of Appeal and Motion for Supersedes *were deficient* in that they were not signed by all Appellants as required by Rule 267(b). Although that deficiency was arguably corrected, *now* someone has *submitted* a Reply on behalf of the Appellants (in support of their Motion for Supersedes) and that Reply is also *not* signed by *any* of the *pro se* Appellants. As such, I am not sure it should be accepted for filing.

While the court rules allow for electronic signatures by those of us licensed to practice law in the State of South Carolina, I am unaware of any such rule allowing electronic signatures by *pro se* litigants. See E-Filing Court Rules, Rule 2(b) ("if the party is represented by an attorney") and Rule 3(a)(1) (e-filing eligibility limited to SC Bar members) and Supreme Court Order on Appellate E-Filing of May 6, 2022 (Case. No. 2020-000447) (Section (b)(1) (limited to limited to SC Bar members)).

# Turner Padget

Letter to South Carolina Court of Appeals

Re: *Betancourt v Blevins*

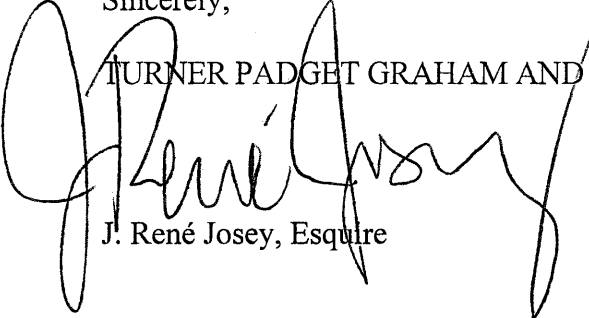
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Accordingly, the court has no assurances that *any*, much less all, of the *pro se* litigants joined in the positions asserted. Moreover, because the Appellants are not licensed to practice law, they have now submitted emails to the court with unauthenticated audio recordings that, to my knowledge, were *not* submitted in the circuit court and, therefore, outside the record.

Obviously, the Respondent cannot consent to any filing that is not properly executed and any submission that includes matters not considered in the circuit court. While the Respondent could file (and may file if required) a more formal motion, we are trying *not* to make this *pro se* litigation any more cumbersome for the court or expensive for the client.

Sincerely,

TURNER PADGET GRAHAM AND LANEY P.A.  
  
J. René Josey, Esquire

JRJ/met

cc: Hampton Grainger Tiller, Esq.  
John Paul Williams, Jr., Esq.  
Dr. Todd Blevins  
Nicole Betancourt  
Thomas Betancourt  
Jimmy Boatwright  
Arnie Boatwright  
Norman Whetzel  
Kristana Whetzel