

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson
Circuit Court Judge

Civil Action No. 2022-CP-22-00912

Appellate Case No. 2024-000023

Michael T. Green and Carrie J. Green; Julian P. Rutledge and Melvin L. Rutledge; Patricia S. Grate; Carlethia B. Jenkins; Frances Jo Baker; Parkersville Planning & Development Alliance, Inc.; Keep It Green, Inc.; and Preserve Murrells Inlet, Inc., Plaintiffs,

Of which Michael T. Green and Carrie J. Green; Julian P. Rutledge and Melvin L. Rutledge; Carlethia B. Jenkins; Frances Jo Baker; Parkersville Planning & Development Alliance, Inc.; Keep It Green, Inc.; and Preserve Murrells Inlet, Inc., are the Appellants,

v.

Georgetown County; Laine CRE, LLC; TriStar Land, LLC; and Samuel J. Nesbit on behalf of the heirs of Will Nesbit, Respondents.

PROOF OF SERVICE

I, the undersigned paralegal of the law offices of Smith Robinson Holler DuBose and Morgan, LLC, do hereby certify that on October 2, 2024, I have served all counsel in this action with a copy of the pleading(s) hereinbelow by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the April 24, 2024 Amended Order of the South Carolina Supreme Court (Appellate Case No. 2020-000447). Service on Pro-se Respondent

Samuel J. Nesbit on behalf of the heirs of Will Nesbit has been mailed, via U.S. Mail, postage paid.

Documents Served: Respondents Georgetown County, Laine CRE, LLC, and TriStar Land, LLC's Joint Final Brief with attached Certificate of Compliance


Counsel Served: Via E-Mail Only
Cynthia Ranck Person, Esq.
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F. Patrick Hubbard, Esq.
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Attorneys for Appellant

Matthew Evan Pecoy, Esq.
mpecoy@darroverett.com
Ashwini Jayaratnam, Esq.
ajayaratnam@darroverett.com
Attorney for Respondents Laine CRE, LLC, and TriStar Land, LLC

Pro-Se Party Served:

Via US Mail Only
Samuel J. Nesbit, on behalf of the heirs of Will Nesbit
6201 Rosebud Street
Columbia, SC 29203
Pro Se Respondent

SMITH | ROBINSON
Smith Robinson Holler DuBose and Morgan, LLC



Sherry Roth

Camden, South Carolina

October 2, 2024

Sherry Roth

From: Sherry Roth
Sent: Wednesday, October 2, 2024 1:04 PM
To: KIG Advocacy; Matthew Pecoy; Ashwini Jayaratnam
Cc: Hubbard, Patrick; Karen Hamlin; Tommy Morgan; Sydney J. Douglas
Subject: RE: Michael T. Green v. Georgetown County- 2024-000023
Attachments: Final Brief of Respondents (GC_Laine_TriStar).pdf; PoS - Joint RFB.pdf; Ltr to COA with bound copy 10.2.24.pdf

Good afternoon, everyone.

Attached please find Respondents' Georgetown County, Laine CRE, LLC, and TriStar Land, LLC's Joint Final Brief with Certificate of Compliance and Proof of Service which are hereby served upon you and will be filed with the Court of Appeals today.

Thank you,
Sherry



Camden

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From: Tommy Morgan <tommy.morgan@smithrobinsonlaw.com>
Sent: Friday, July 5, 2024 12:41 PM
To: KIG Advocacy <kig.advocacy@gmail.com>; Sydney Douglas <sydney.douglas@smithrobinsonlaw.com>; Matthew Pecoy <mpecoy@darroweverett.com>
Cc: Hubbard, Patrick <p Hubbard@law.sc.edu>; Karen Hamlin <khamlin@darroweverett.com>; Tommy Morgan <tommy.morgan@smithrobinsonlaw.com>; Sherry Roth <Sherry.roth@smithrobinsonlaw.com>
Subject: RE: Michael T. Green v. Georgetown County- 2024-000023

Cindy & Prof. Hubbard,

Hope y'all are having a great Fourth of July weekend.

Attached please find Respondents' Georgetown County, Laine CRE, LLC, and Tristar Land, LLC's Joint Initial Brief, Designation of Matter, and Proof of Service which are hereby served upon you and will be filed with the Court of Appeals today.

Thanks,
Tommy

CONFIDENTIALITY NOTICE: The information transmitted, including any attachments, is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from any computer. Intentional interception or dissemination of electronic mail not belonging to you may violate federal or state law.

From: KIG Advocacy <kig.advocacy@gmail.com>
Sent: Thursday, April 4, 2024 1:32 PM
To: Tommy Morgan <tommy.morgan@smithrobinsonlaw.com>; Sydney Douglas <sydney.douglas@smithrobinsonlaw.com>; Matthew Pecoy <mpecoy@darroweverett.com>
Cc: Hubbard, Patrick <p Hubbard@law.sc.edu>
Subject: Michael T. Green v. Georgetown County- 2024-000023

Dear Tommy, Sydney and Matthew:

Attached please find Appellants' Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service which are hereby served upon you and will be filed with the Court of Appeals today.

Thanks,

Cindy

Cynthia Ranck Person, Esquire
Legal Counsel & Executive Director

KEEP IT GREEN ADVOCACY, INC.

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Reply To: Columbia
Sydney.douglas@smithrobinsonlaw.com

October 2, 2024

Via U.S. Mail Only

Samuel J. Nesbit, on behalf of the heirs of Will Nesbit
6201 Rosebud Street
Columbia, SC 29203

***RE: Michael T. Green, et al. vs. Georgetown County, et al.
Appellate Case No. 2024-000023***

Dear Mr. Nesbit,

Enclosed please find copies of the Respondents Georgetown County, Laine CRE, LLC, and TriStar Land, LLC's Joint Final Brief, Certificate of Compliance, and Proof of Service for your records.

If you have any questions or concerns, please let me know.

Sincerely,

SMITH ROBINSON HOLLER
DuBOSE AND MORGAN, LLC



Sydney J. Douglas

SD/sr
Enclosures

cc: Cynthia Ranck Person, Esq., *via email only w/o enclosures*
F. Patrick Hubbard, Esq., *via email only w/o enclosures*
Matthew E. Pecoy, Esq., *via email only w/o enclosures*
Ashwini Jayaratnam, Esq., *via email only w/o enclosures*