

RECEIVED

Oct 11 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

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

---

APPELLATE CASE NO. 2023-001592

---

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.

---

PROOF OF SERVICE

---

I hereby certify that this law firm represents the Appellants in the above-captioned matter and that on the date below, in Asheville, North Carolina, a copy of the Appellants' Final Brief and a copy of the Record on Appeal, was served upon the following persons via electronic mail to their AIS e-mail addresses:

**Documents Served:**

**APPELLANTS' FINAL BRIEF AND RECORD  
ON APPEAL**

**Parties Served:**

Michael S. Traynham, Esq.  
Maynard Nexsen  
1230 Main Street, Suite 700  
Columbia, SC 29201  
[MTraynham@maynardnexsen.com](mailto:MTraynham@maynardnexsen.com),  
*Counsel for Simmons Family Holdings, LLC*

and

Bradley Churdar, Esq.  
SC DHEC  
1362 McMillan Ave., Suite 400  
Charleston, SC 29405  
[churdabd@dhec.sc.gov](mailto:churdabd@dhec.sc.gov)  
*Counsel for the South Carolina Department of Health and Environmental Control*

In addition, two (2) paper copies of the Appellants' Brief and the Record on Appeal were filed with the Court this date by depositing same in the United States Mail, postage prepaid, addressed to: Clerk, South Carolina Court of Appeals, 1220 Senate Street, Columbia, South Carolina, 29201.



---

Thomas C. Taylor, Esq.  
Law Office of Thomas C. Taylor, LLC.  
Post Office Box 1808, Bluffton, SC 29910  
South Carolina Bar Number: 5499  
Phone: 843-785-5050; Fax: 843-738-4502  
Email: [tom@thomastaylorlaw.com](mailto:tom@thomastaylorlaw.com)

ATTORNEY FOR APPELLANTS  
WILLIAM P. SCURRY AND J & W  
CORPORATION OF GREENWOOD

Asheville, North Carolina  
October 11, 2024