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**Dec 06 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GEORGETOWN COUNTY

Court of Common Pleas

The Honorable B. Alex Hyman

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Case No. 2020-CP-22-00356

Appellate Case No. 2023-001454

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Ron Christmas,

Appellant,

v.

County of Georgetown, City of Georgetown, and South Carolina Department of Transportation,

Respondents.

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**RECORD ON APPEAL  
VOLUME V OF VII**

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Justin O'Toole Lucey (SC Bar No.: 15438)  
Sohayla R. Townes (SC Bar No.: 102814)  
JUSTIN O'TOOLE LUCEY, P.A.  
415 Mill Street  
Mount Pleasant, South Carolina 29464  
(843) 849-8400  
jlucey@lucey-law.com  
stownes@lucey-law.com  
*Attorneys for the Appellant*

M. Kirk Battle, Esq.  
Michael W. Battle, Esq.  
Battle Law Firm, LLC  
P.O. Box 530  
Conway, SC 29528  
[kbattle@battlelawsc.com](mailto:kbattle@battlelawsc.com)  
[mbattle@battlelawsc.com](mailto:mbattle@battlelawsc.com)  
*Attorneys for County of Georgetown*

Andrew F. Lindemann, Esq.  
Lindemann Law Firm, P.A.  
P.O. Box 6923  
Columbia, SC 29260  
[andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)  
*Attorney for City of Georgetown*

Lisa A. Thomas, Esq.  
Carmen V. Ganjehsani, Esq.  
Richardson Plowden  
Office: 2103 Farlow Street  
Myrtle Beach, SC 29577  
Mailing Address: P.O. Box 3646  
Myrtle Beach, SC 29578  
[lthomas@richardsonplowden.com](mailto:lthomas@richardsonplowden.com)  
[cganjehsani@richardsonplowden.com](mailto:cganjehsani@richardsonplowden.com)  
*Attorneys for South Carolina Department of  
Transportation*

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JUSTIN O'TOOLE LUCEY, P.A.

*/s/Justin Lucey*

Justin O'Toole Lucey (SC Bar No.: 15438)

Sohayla R. Townes (SC Bar No.: 102814)

415 Mill Street

Mount Pleasant, SC 29464

Telephone: (843) 849-8400

*Attorneys for Appellant*

Charleston, South Carolina  
December 6, 2024

8-25-00  
EJ

AN ORDINANCE AUTHORIZING CONVEYANCE AND DELIVERY TO THE COUNTY OF GEORGETOWN ALL PERSONAL PROPERTY OWNED BY THE CITY OF GEORGETOWN AND USED IN ITS RECREATIONAL ACTIVITIES; AUTHORIZING LEASING OF CERTAIN REAL PROPERTIES TO THE COUNTY OF GEORGETOWN FOR PUBLIC RECREATIONAL USE; AND AUTHORIZING THE CITY OF GEORGETOWN TO EXECUTE A CONTRACT WITH THE COUNTY OF GEORGETOWN FOR FIRE PROTECTION TO A DESIGNATED AREA OUTSIDE AND CONTIGUOUS TO THE CITY LIMITS OF GEORGETOWN, SOUTH CAROLINA, ALL FOR A PERIOD OF TEN (10) YEARS

BE IT ORDAINED BY City Council duly assembled:

Section 1: That the City of Georgetown, a municipal corporation, is hereby authorized to transfer, convey and deliver by title, Bill of Sale, or otherwise, to the County of Georgetown, a body politic and corporate, any and all personal property presently used in recreational activities, including vehicles that are presently owned or used by the City of Georgetown, in such recreational activities, the said County of Georgetown having agreed to assume the ownership, control and supervision of all public recreational activity within the City limits of Georgetown, South Carolina. The contract between the City of Georgetown and County of Georgetown shall provide that no buildings shall be placed on the City property or properties in which the City has a leasehold interest without the written permission of the City and/or its Lessor.

Section 2: That the City of Georgetown shall lease, for public recreational use only, all of its right, title and interest in real properties to the County of Georgetown, identified as follows, to-wit:

(a) Land and facilities located within the confines of East Bay Park and circled by Greenwich Drive, Front Street and East Bay Street in said City.

(b) Maryville School Athletic Park.

(c) Land and facilities located at corner of Front Street and Kaminski Street.

(d) City Stadium Block now under lease to the County Board of Education.

That in the event any of the aforementioned identified leasehold interests and properties of the City is not used for recreational purposes by County, same shall revert to City for its use.

Section 3: For the supervision, assumption and control by the County of the City's recreational activities, the City shall cause to be paid to the County the following monies:

(a) Payable to County of Georgetown by the City the sum of \$135,000.00 Dollars at \$11,250.00 Dollars per month commencing January 1, 1982.


(b) Payable to County of Georgetown by the City the sum of \$90,000.00 Dollars at the sum of \$7,500.00 Dollars per month commencing January 1, 1983.

(c) Payable to the County of Georgetown by the City of Georgetown the sum of \$45,000.00 Dollars at the sum of \$3,750.00 Dollars per month commencing January 1, 1984.

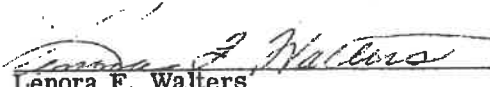
Section 4: The City shall execute a contract with the County to furnish the County complete 24-hour fire protection to the area presently designated in the City of Georgetown's outside fire protection area for a period of three (3) years commencing January 1, 1982, and ending December 31, 1984, at no cost to the County of Georgetown, and shall provide said fire protection to the designated outside fire protection area during the 4th and 5th years at a cost of 10% of the 4th year's City of Georgetown Fire Department budget. For the 6th and 7th years and every two-year period thereafter, a new base shall be established amounting to 10% of the first year's budget of each successive two-year period. During and after the 4th year, payment shall be made to the City on or before July 1st of each year. The City shall contract for a period of ten (10) years on its obligations under said contract with optional two-year periods thereafter at the election of either party.

PASSED at City Council duly assembled this 19th day of November,

1981.

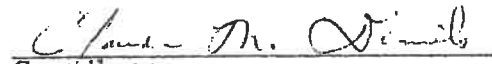
  
\_\_\_\_\_  
Douglas L. Hinds, Mayor  
City of Georgetown

Attest:

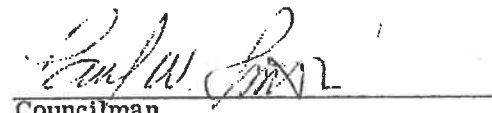
  
\_\_\_\_\_  
Lenora F. Walters  
City Clerk and Treasurer

Introduced 11-19-81

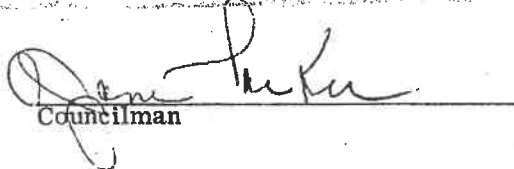
Final Reading 12-03-81

  
\_\_\_\_\_  
Councilman

\_\_\_\_\_  
Councilman

  
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Councilman

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Councilman

  
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Councilman

  
\_\_\_\_\_  
Councilman



STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF GEORGETOWN )

LEASE AGREEMENT

THIS LEASE AGREEMENT ("Agreement") shall be effective this 11 day of July, 2006 by and between the City of Georgetown ("City") and the County of Georgetown ("County").

WITNESSETH:

WHEREAS, City is the owner of certain property known as East Bay Park in the City of Georgetown, SC and further described on Exhibit A (the "Property") attached hereto and incorporated herein by reference; and

WHEREAS, City has agreed to lease, for public use only, all of its right, title and interest in Property to County subject to the terms and conditions set forth in this Agreement.

NOW, THEREFORE, in consideration of the foregoing recitals, the promises, covenants, agreements and obligations of City and County herein contained, and other good and valuable consideration, the receipt and adequacy of which each acknowledges, City and County agree as follows:

1. Term. The term of the lease shall be for twenty years ("Term"), commencing on the 1<sup>st</sup> day of January 2006 (the Commencement Date) and subject to renewal as hereafter noted.
2. Renewal. This agreement shall be for one year and will renew annually, without notice or request by either party, unless either party provides written notice as prescribed in Paragraph 12 NO LATER THAN 31 OCTOBER of the current year of its intent to terminate this agreement.
3. Rent. Commencing on the Commencement Date, County shall pay City Rent (as herein after defined) at the address specified in Paragraph 17, or City may designate other such place. The Rent shall be \$1.00 per year.
4. End of Term. Upon expiration of the Term or other termination of this Agreement, County shall quit and surrender Property to City. All improvements to Property shall remain.
5. Maintenance. County shall be responsible for all maintenance and upkeep of Property. Property specifically excludes all roads surrounding Property.
6. Improvements/Demolition. Any improvements/demolition exceeding fifty thousand

(\$50,000) dollars will have prior written approval from the City.

7. Insurance. County agrees to maintain, at its own expense, hazard insurance on the premises in an amount not less than the cash value of the entire building, and any other buildings or structures located on the athletic fields. Georgetown County shall pay for and maintain liability insurance covering all activities conducted on the premises with the minimum coverage of one million (\$1,000,000) dollars.

8. Governing Law. This Agreement shall be construed in accordance with the laws of the State of South Carolina. Any litigation arising out of this agreement shall be resolved through the 15<sup>th</sup> Judicial Circuit Court of South Carolina in Georgetown County.

9. Relationship of Parties. The relationship between City and County shall always and only be that of lessor and lessee. County shall never at any time during the term of this Agreement become the agent of City, and City shall not be responsible for the acts or omissions of County, its employees, or agents.

10. Remedies Cumulative. The rights and remedies with respect to any of the terms and conditions of this Agreement shall be cumulative and not exclusive, and shall be in addition to all other rights and remedies available to either party in law or equity.

11. Indemnification. The County indemnifies and holds the City, its officers, council members, agents and employees harmless from any liability, claim, cause of action, damages or payments arising from or out of or in connection with the use by the County, its agents, employees, or volunteers of the real property, facilities, or personal property of the County and/or the City pursuant to the terms of this agreement.

12. Notices. Any notice given by one party to the other in connection with this Agreement shall be in writing and shall be sent by certified or registered mail, return receipt requested:

If to City, addressed to:

City of Georgetown  
Post Office Drawer 939  
Georgetown, SC 29442

If to County, addressed to:

Georgetown County  
P. O. Box 421270  
Georgetown, SC 29442

Notices shall be deemed to have been received on the date of receipt as shown

on the return receipt.

13. Waiver. The waiver by either party of any covenant or condition of this Agreement shall not thereafter preclude such party from demanding performance in accordance with the terms hereof.

14. Successors Bound. This Agreement shall be binding on and shall inure to the benefit of the heirs, legal representatives, successors and assigns of the parties hereto.

15. Severability. If a provision hereof shall be finally declared void or illegal by any court or agency having jurisdiction over the parties to this Agreement, the entire Agreement shall not be void, but the remaining provisions shall continue in effect as nearly as possible in accordance with the original intent of the parties.

IN WITNESS WHEREOF, the parties have executed this Lease Agreement to be signed and sealed the day and year first above written.

WITNESSES

Cynthia C. Howard

Ann U. Mercer

CITY OF GEORGETOWN

By: [Signature]

It's: City Administrator

WITNESSES

[Signature]  
[Signature]

COUNTY OF GEORGETOWN

By: [Signature]

It's: Chairman

**EXHIBIT A**

The Property subject to this Agreement is located in the City of Georgetown and commonly known as East Bay Park. It is further defined as:

Land, facilities, recreational equipment, and improvements located within the confines of East Bay Park and circled by Greenwich Drive, Front Street, and East Bay Street in the City of Georgetown.

The Property specifically excludes the streets listed above that surround the Property.

**SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION  
Encroachment Permit**



Permit No : 203740

Permit Decision Date :  
6/23/2017

Expiration Date : 6/23/2018

Type

Permit : MUNICIPALITY /  
LOCAL FUNDED  
PROJECT

Location:

<u>District</u>	<u>Work County</u>	<u>Type</u>	<u>Route</u>	<u>Aux</u>	<u>Begin MP</u>	<u>End MP</u>
5	Georgetown, SC	S-	151	None	0.620	0.620

Contact  
Information

Applicant: CityofGeorgetown

Phone:

Orlando Arteaga, PE (Please contact

Contact: EOR Kevin Barnes at (843) 213-  
3268)

Address: 2377 Anthuan Maybank Drive,

City: Georgetown

State: SC

Zip: 26440

Comments

The Project is located inside East Bay Park adjacent to East Bay Street (S-151). The project includes the area from River Road (S-153) to the south and extends to East Bay Street (S-151) on the west and south and Greenwich Drive (S-154) to the east.

Special Provisions:

0003 - WHEN ROADS ARE RESURFACED, SHOULDERS SHALL BE REGRADED TO THE EDGE OF PAVEMENT TO CONFORM TO THE DEPARTMENT SPECIFICATIONS.

0004 - SCDOT SHALL BE NOTIFIED WHEN WORK DEFINED IN THE PERMIT STARTS AS WELL AS WHEN THE WORK IS COMPLETED. REFERENCE SHALL BE MADE BY PERMIT NUMBER.

0005 - APPLICANT SHALL PROVIDE TO THE DEPARTMENT THE OPPORTUNITY OF ATTENDING ANY PRE-CONSTRUCTION MEETING PRIOR TO THE BEGINNING OF WORK.

0123 - ALL WORK PERFORMED IN CONNECTION WITH THIS PERMIT SHALL CONFORM TO THE SCDOT "A POLICY FOR ACCOMODATING UTILITIES ON HIGHWAY RIGHT-OF-WAY" MOST CURRENT EDITION.

0125 - ALL CROSSLINE PIPES ARE TO BE LOCATED AND FLAGGED PRIOR TO

BEGINNING OPERATION.

0201 - DRIVEWAYS ARE TO CONSIST OF A MINIMUM OF 6" STABILIZED AGGREGATE BASE, 4" ASPHALTIC BASE COURSE AND 2" OF ASPHALT CONCRETE SURFACE COURSE.

0202 - PAVEMENT DESIGN SHALL BE AS SHOWN ON ATTACHED DOCUMENTATION

0207 - PIPE USED IN THIS INSTALLATION SHALL BE IN ACCORDANCE WITH SCDOT SPECIFICATION SC-M-714 AND COMPLY WITH CURRENT SCDOT POLICY.

0208 - REINFORCED CONCRETE PIPE SHALL BE USED FOR DRIVEWAY DRAINAGE.

0209 - DISTURBED VEGETATION SHALL BE RESEDED ACCORDING TO THE SPECIFICATION FOR HIGHWAY CONSTRUCTION.

0301 - THE DITCHES AND/OR SHOULDERS DISTURBED DURING THE INSTALLATION SHALL BE RE-ESTABLISHED TO PROPER GRADE, ORIGINAL CROSS SECTION, STABILIZED, AND ALL DRAIN PIPES CLEARED.

0302 - NO EXCAVATION SHALL BE LEFT OPEN ALONG HIGHWAY.

0303 - THE ENTIRE DISTURBED AREA SHALL BE TOP-SOILED USING 3" OF SELECTED MATERIAL AND RE-GRASSED TO SCDOT SPECIFICATIONS.

0304 - PAVEMENT MARKINGS ALTERED DURING THIS INSTALLATION SHALL BE RESTORED BY THE APPLICANT.

0306 - TRAFFIC CONTROL, LIGHTS, SIGNS AND FLAG-MEN WILL BE FURNISHED BY APPLICANT AND WILL CONFORM TO PART VI OF THE MANUAL ON UNIFORM TRAFFIC CONTROL DEVICES.

0310 - FIELD CHANGES, IF NECESSARY, MUST BE APPROVED IN WRITING BEFORE ACTUAL CONSTRUCTION OF PROPOSED CHANGES.

0311 - SEDIMENT AND EROSION CONTROL DEVICES SHALL BE USED TO MINIMIZE THE MOVEMENT OF SEDIMENT.

0312 - THE PERMITTEE SHALL HOLD THE DEPARTMENT HARMLESS FOR DAMAGES TO BOTH UPSTREAM AND DOWNSTREAM PROPERTIES.

0318 - THE APPLICANT SHALL BE RESPONSIBLE FOR IMMEDIATE REMOVAL OF SUCH TRAFFIC HAZARDS AS MUD, DEBRIS, LOOSE STONE, AND TRASH AS MAY BE WASHED OR SPILLED ON THE TRAVELED ROADWAY AS A RESULT OF THE PROPOSED WORK.

RECORD ON APPEAL INDEX NO. 26.

APPELLANT EXHIBIT:

(DEFENDANTS) EXH. 22:

VIDEO

RECORD ON APPEAL INDEX NO. 27

APPELLANT EXHIBIT:

(DEFENDANTS) EXH. 25:

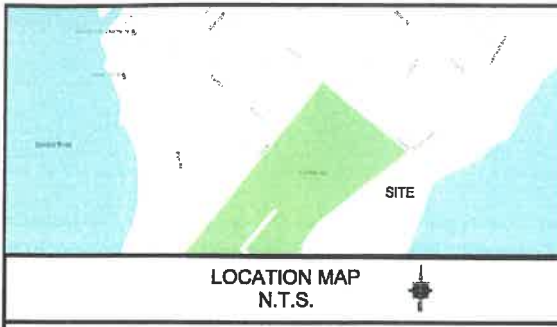
VIDEO

RECORD ON APPEAL INDEX NO. 28

APPELLANT EXHIBIT:

(DEFENDANTS) EXH. 26:

VIDEO



**PLAINTIFFS**  
**EXHIBIT** 5/15/23  
**38**  
 exhibittruck.com

ENGINEERING / PLANNING  
 2411 North Oak Street  
 Suite 307L  
 Myrtle Beach, SC 29577  
 Telephone 843-448-0910  
 Fax 843-448-0909  
 www.castlesengineering.com

**EXISTING ROADWAY PLAN  
 AND PROFILE TOPO  
 FOR:  
 GEORGETOWN WATERFRONT**

**EXISTING ROADWAY PLAN AND PROFILE TOPO  
 COVER SHEET**  
**GEORGETOWN WATERFRONT**  
 for  
 JUSTIN O'TOOLE LUCEY, PA  
 GEORGETOWN, SOUTH CAROLINA

SCALE: N.T.S.  
 DESIGNED BY: RLC  
 DRAWN BY: TCM  
 CHECKED BY: RLC  
 DATE ISSUED: 02/21/2021

SHEET INDEX:	
DESCRIPTION	SHEET
COVER SHEET	1 OF 5
KEY PLAN	2 OF 5
EXISTING ROADWAY PLAN AND PROFILE TOPO	3 OF 5 TO 5 OF 5

NO.	DATE	REVISION



SHEET NUMBER:  
**1 OF 5**  
 PROJECT#: 19.042

HORIZONTAL DATUM: NAD 83  
 VERTICAL DATUM: NAVD 88(11)

R-0900

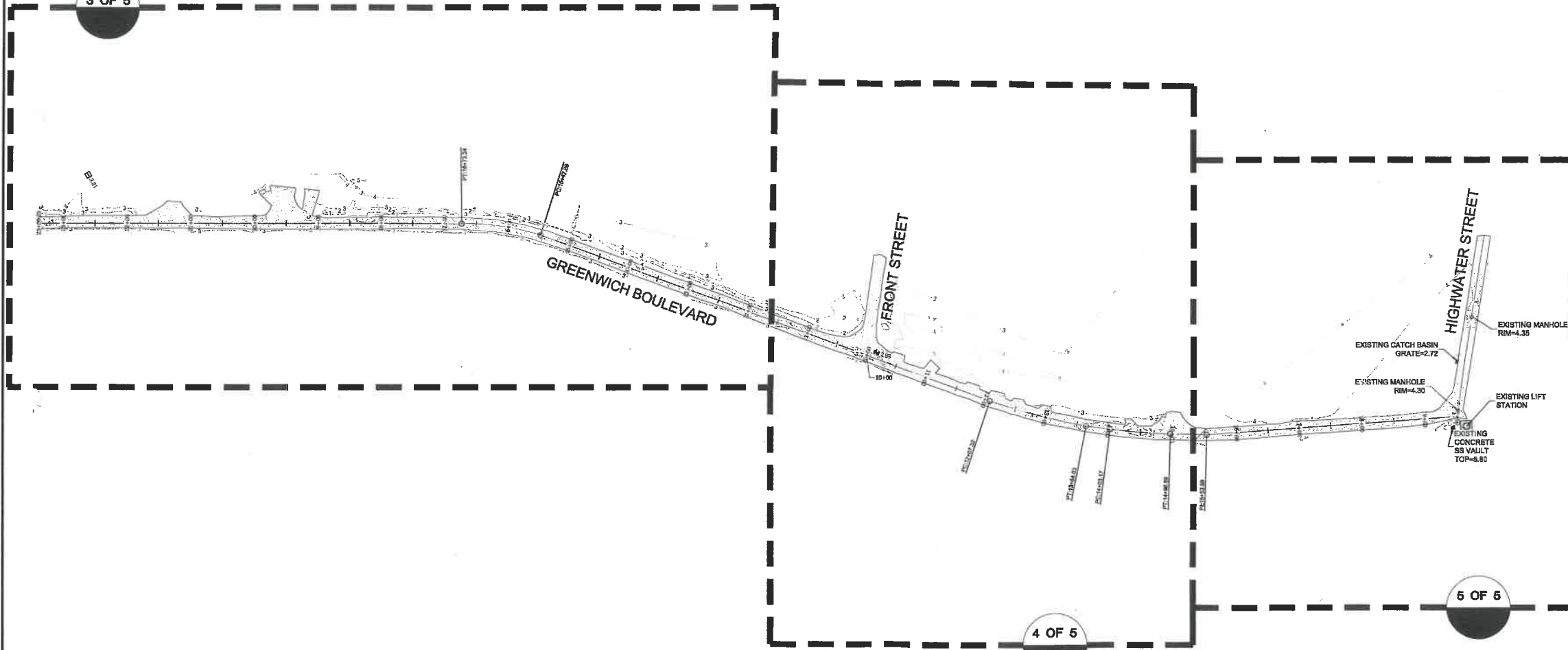
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ENGINEERING / PLANNING  
 2411 North Oak Street  
 Suite 3057  
 Myrtle Beach, SC 29577  
 Telephone: 843-4480910  
 Fax: 843-4480969  
 www.castlesengineering.com



3 OF 5



EXISTING ROADWAY PLAN AND PROFILE TOPO  
 KEY PLAN  
**GEORGETOWN WATERFRONT**  
 for  
 JUSTIN OTTOLE LUCEY, PA  
 GEORGETOWN, SOUTH CAROLINA

SCALE: 1" = 60'  
 DESIGNED BY: RLC  
 DRAWN BY: TCM  
 CHECKED BY: RLC  
 DATE ISSUED: 08/21/2021

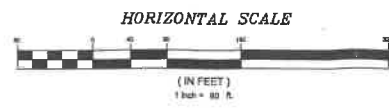
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SHEET NUMBER:

2 OF 5

PROJECT#: 19.042

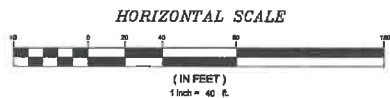
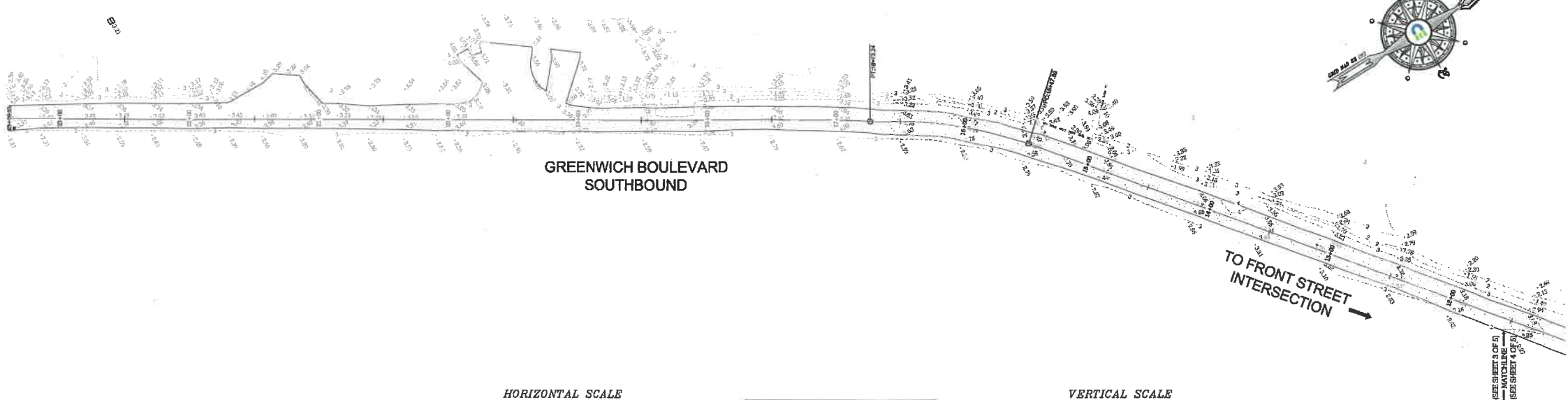


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 VERTICAL DATUM NAVD 88(10)

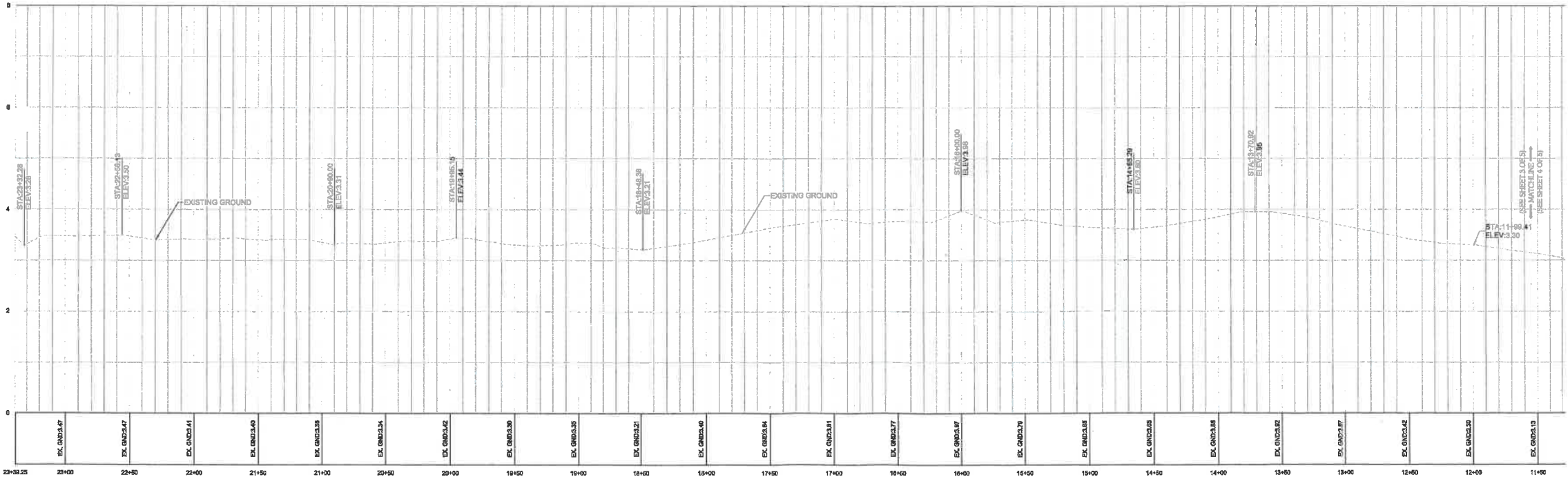
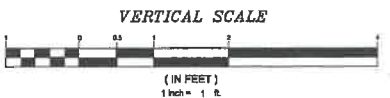
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5 OF 5

R-0901



HORIZONTAL DATUM: NAD 83  
 VERTICAL DATUM: NAVD 88(10)



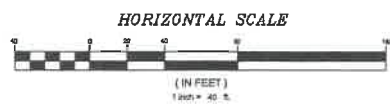
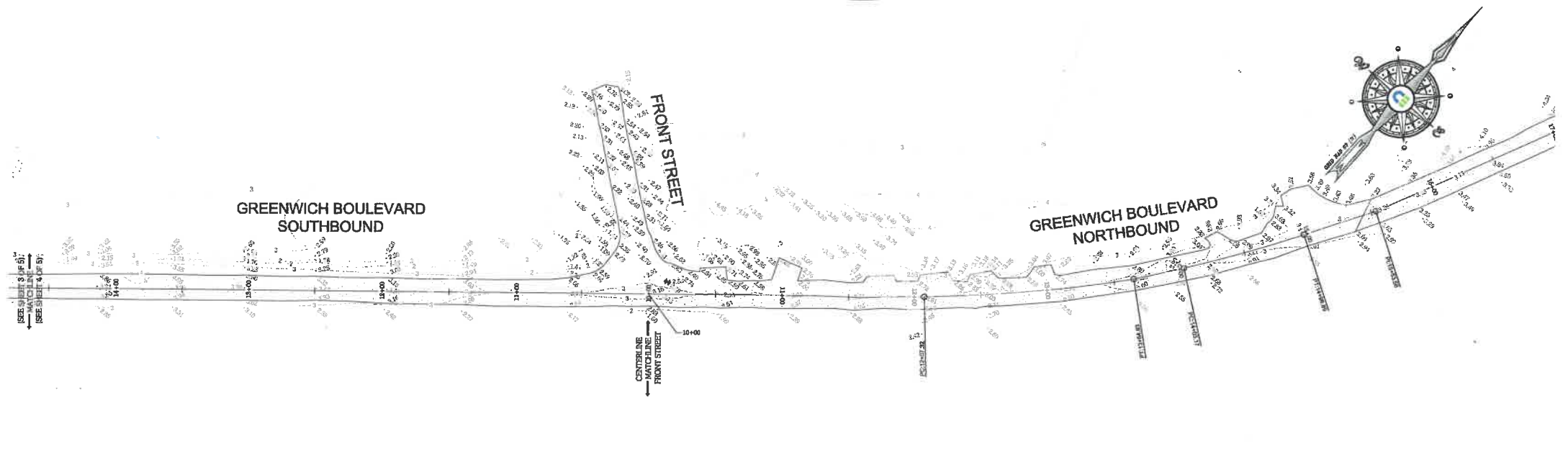
GREENWICH BOULEVARD SOUTHBOUND

R-0902

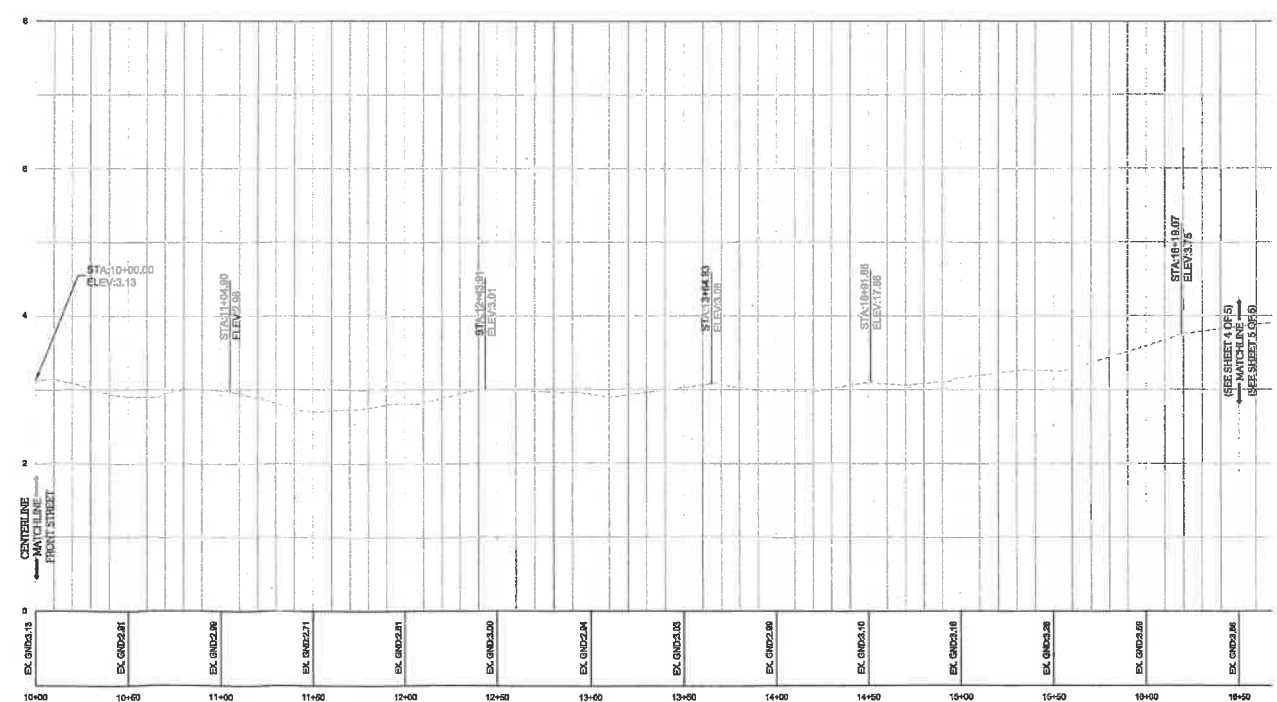
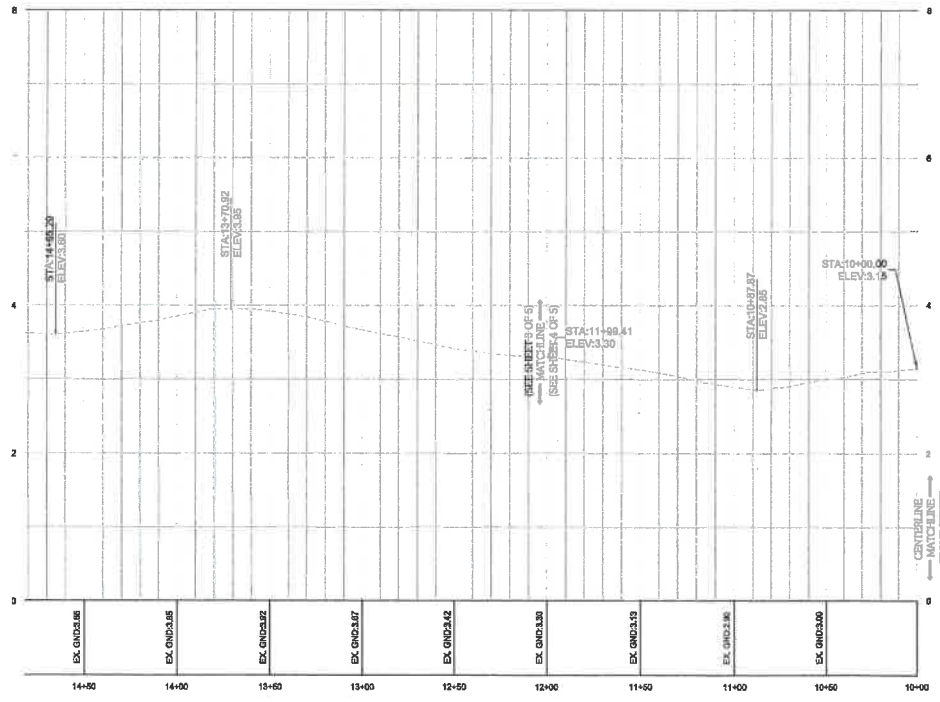
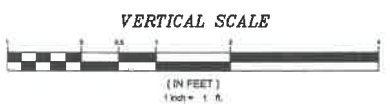
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DRAWN BY:	TCM
CHECKED BY:	RLC
DATE ISSUED:	05/21/2021

Revision	Date	By
1		
2		
3		
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HORIZONTAL DATUM: NAD 83  
VERTICAL DATUM: NAVD 88(10)



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EXISTING ROADWAY PLAN AND PROFILE

**GEORGETOWN WATERFRONT**

by  
JUSTIN PTOOLE LUCEY, P.A.  
GEORGETOWN, SOUTH CAROLINA

SCALE: AS SHOWN

DESIGNED BY:	RLC
DRAWN BY:	TCM
CHECKED BY:	RLC
DATE ISSUED:	05/21/2021

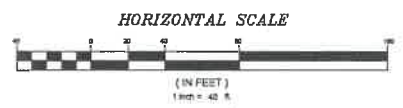
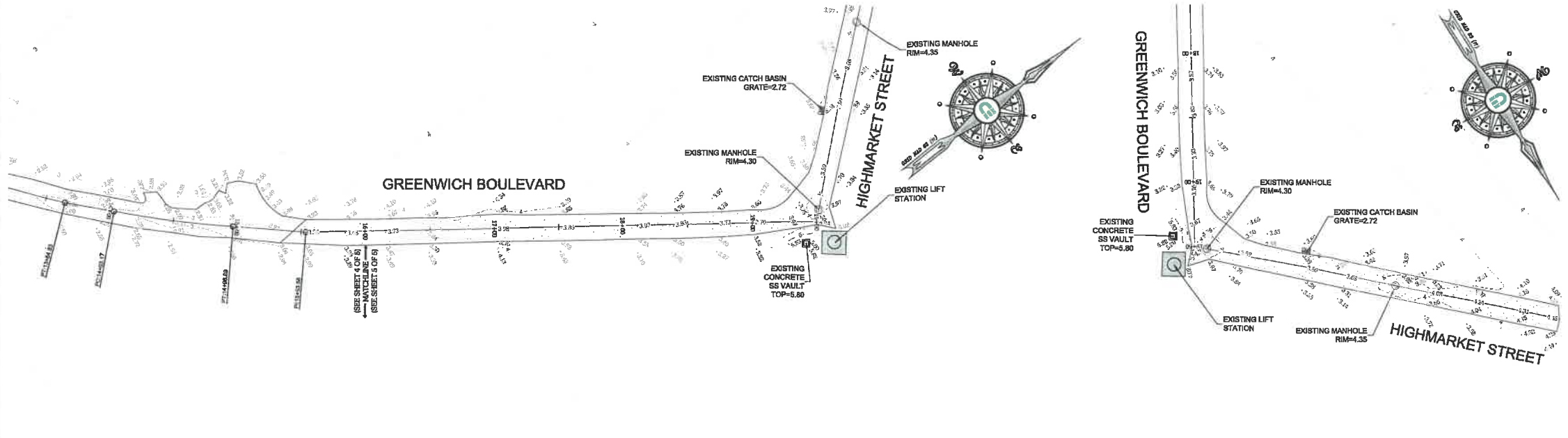
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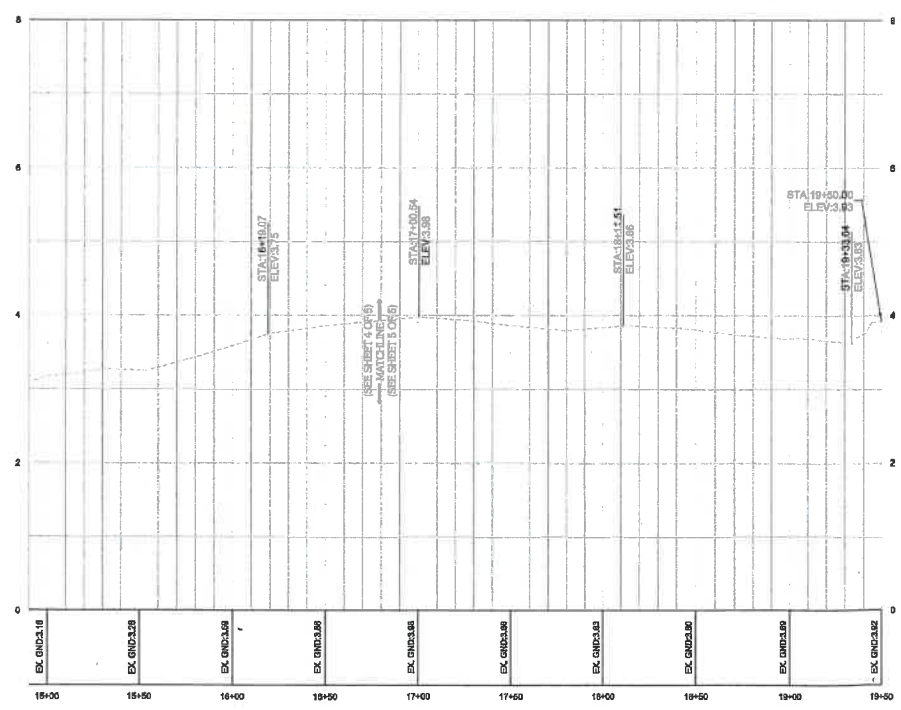
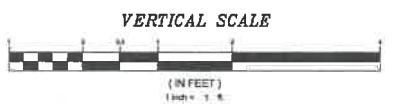
SHEET NUMBER:  
**4 OF 5**

PROJECT: 19.042

R-0903



HORIZONTAL DATUM: NAD 83  
VERTICAL DATUM: NAVD 88(1)



GREENWICH BOULEVARD FRONT STREET INTERSECTION TO HIGHMARKET STREET

SCALE: AS SHOWN

DESIGNED BY:	RLC
DRAWN BY:	TCM
CHECKED BY:	RLC
DATE ISSUED:	05/21/2021

Revision	Date	Description
1		
2		
3		
4		
5		





June 29, 2021

Lucey Law Firm  
Josh Evans, Esq.  
P.O. Box 806  
Mt. Pleasant, SC 29494

RE: Georgetown Flooding along Greenwich Street and Front Street

Dear Mr. Evans:

Castles Consulting and Forensics was asked to look at the flooding along Greenwich Street and Front Street where this area was being flooded during numerous high tide events, causing damage to the road and storm drainage systems, as well as surrounding properties in the immediate area.

I have looked at available data from SCDOT (owner of the roads), City of Georgetown (who owns East Bay Park) and Georgetown County (who leases East Bay Park from the City).

The roads were constructed in the late fifties by the SCDOT, and it appears little maintenance has been done to the roads since then except for the North End of Greenwich Street where it appears it was raised in the turn and overlapped with new asphalt. Based on the Construction Plans of road, the road was built based on a constant elevation of around 4.0 Elevation NAVD 88 Datum.

Georgetown County entered into a lease with the City of Georgetown to turn the area into a recreational area with ballfields, tennis courts, walking trail and area for car and boat trailer parking for the boat ramp across the street. There was also a metal building built as an all-purpose recreation center. There is a wetland located along Front Street that runs from Greenwich Street to East Bay Street. In early years, this whole area flooded at times including the peninsula across the street at the south end of the park. In the developing of the park, Georgetown County brought in hundreds of truckloads of dirt to raise the park, so it did not flood. There was even a "request for proposals" put out to engineering firms including a request "to look at and fill areas so the park would not flood." This was done by raising the ground and thereby forcing this water down towards the area of Front Street and Greenwich Street. The wetlands have also been altered where some of its depth for storm water storage was removed by either filling or just planting and mowing the grass causing this area to

fill up and reduce its capacity to store water, thus pushing it into the road and onto adjacent properties.

Because of these actions and the continuous loading by the trucks hauling fill dirt, the roads at the intersection of Front Street and Greenwich Street have subsided from as much as 18" from design grade. The drainage system has also subsided by 12"-18". The last time I was out there, the flap valve on the end of the drainage line into the marsh at the end of Front Street was not sealing tight because water was backing up and coming out of the grates at the road before any water was overtopping the road. There had not been any rain for several days, so I know it was not from that.

This condition has led to significant damage to surrounding private homes and the inability to access them in times of emergency.

It is my professional opinion that it is too late to remove the dirt in the areas that were once receiving this overflow of water, but the following should be done:

1. Rebuild road up to a minimum crown elevation of 4.0' from the high points on the north and south ends of Greenwich Street.
2. Rebuild the drainage along Front Street and Greenwich Street and the pipe and flap valve out into the marsh.
3. Taper pavement from Greenwich Street and Prince Street, down to Front Street and correct shoulders along Greenwich Street and Front Street.
4. Dig out part, or all, of the wetlands on the East Park along Front Street to create a lake or low point to catch any excess water that breaches the road during severe tide events and rain events where the water temporarily backs up and floods. In lieu of digging out the wetlands, a pump station could be installed at the corner of Front Street and Greenwich Street to handle the excess water.
5. Repairs to private homes and property damaged by flooding caused by City/County project.

This will not only protect the private property owners, but also the East Bay Park where tennis courts and parking lots have been built up as high as 3' above existing grade.

Sincerely,



Robert L. Castles, Jr.  
PE SC 8626





An official website of the United States government



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# Climate Change Indicators

CONTACT US <<https://epa.gov/climate-indicators/forms/contact-us-about-climate-indicators>>

Climate Change Indicators  
<<https://epa.gov/climate-indicators>>

Greenhouse Gases  
<<https://epa.gov/climate-indicators/greenhouse-gases>>

Weather and Climate  
<<https://epa.gov/climate-indicators/weather-climate>>

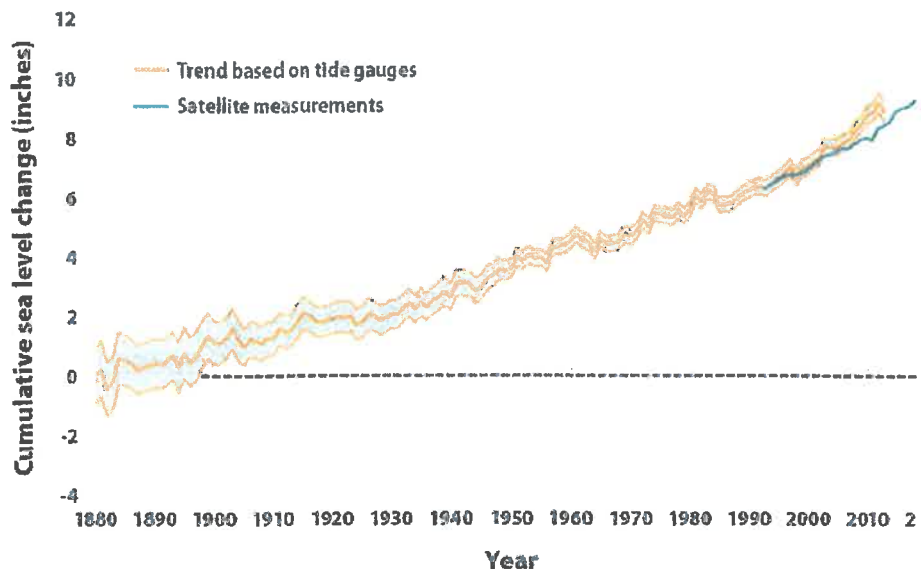
## Oceans

Ocean Heat  
<<https://epa.gov/climate-indicators/climate-change-indicators-ocean-heat>>

# Climate Change Indicators: Sea Level

This indicator describes how sea level has changed over time. The indicator describes two types of sea level changes: absolute and relative.

**Figure 1.** Global Average Absolute Sea Level Change, 1880–2019



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"Figure 1. Global Average Absolute Sea Level Change, 1880-2019",,,,,

Source: EPA's Climate Change Indicators in the United States: [www.epa.gov/climate-indicators](http://www.epa.gov/climate-indicators),,,,,

"Data source: CSIRO, 2017; NOAA, 2021",,,,,

Web update: April 2021,,,,,

Units: inches,,,,,

Year,CSIRO - Adjusted sea level (inches),CSIRO - Lower error bound (inches),CSIRO - Upper error bound (inches),NOAA - Adjusted sea level (inches)

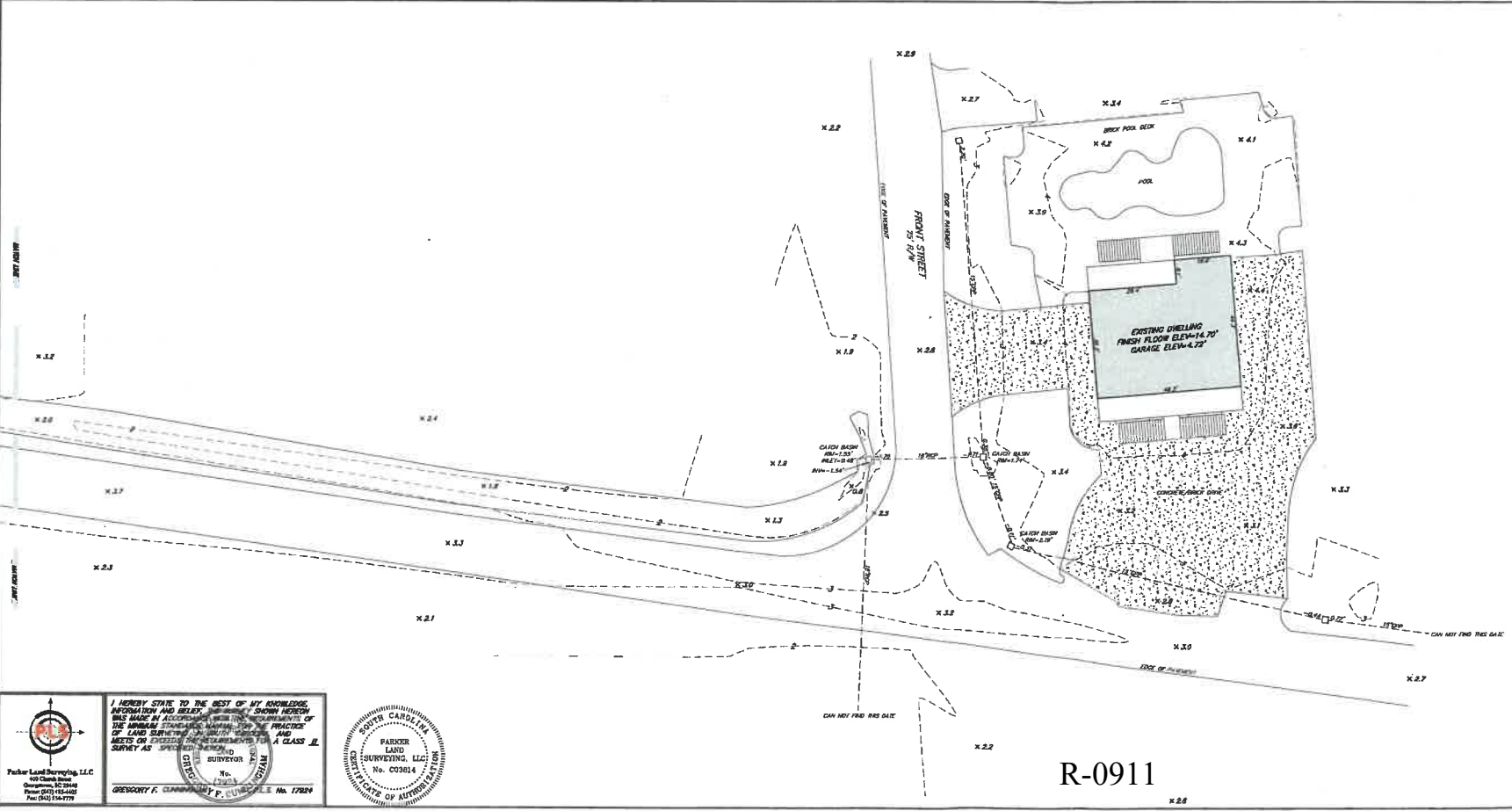
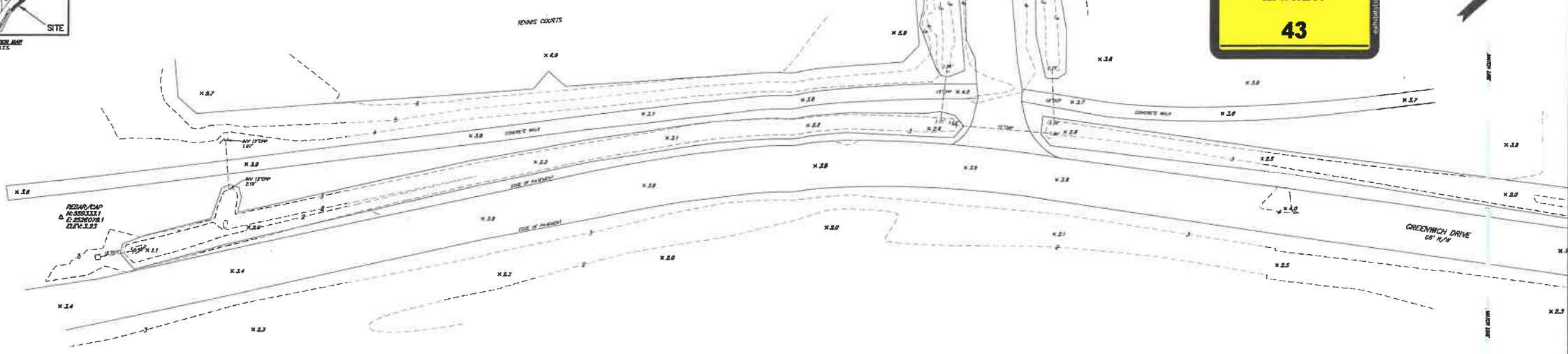
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Christmas-000041

R-0910

**PLAINTIFF EXHIBIT**  
**43**



- NOTES
1. THIS PROPERTY IS SUBJECT TO ALL EASEMENTS AND RESTRICTIONS OF RECORD, NO TITLE SEARCH PERFORMED BY THIS OFFICE.
  2. THIS SURVEY WAS PREPARED FOR THE EXCLUSIVE USE OF THE PERSON(S) OR ENTITY APPEARING ON SAID SURVEY. THIS SURVEY DOES NOT EXTEND TO ANY UNNAMED PERSON(S) OR ENTITY WITHOUT AN EXPRESS REPERCUSSION BY PARKER LAND SURVEYING, LLC.
  3. THIS SURVEY IS NULL AND VOID IF SIGNATURE AND EMBOSSED SEAL ARE ABSENT.
  4. ALL BEARINGS AND COORDINATES SHOWN HEREON ARE BASED ON SOUTH CAROLINA STATE PLANE COORDINATE SYSTEM 1983. DISTANCES SHOWN HEREON ARE HORIZONTAL (GROUND) DISTANCES, NOT GRID DISTANCES.
  5. ELEVATIONS SHOWN BASED ON MVD 80 DATUM.
  6. MEAN HIGH WATER IS 1.82' PER NOAA VERTICAL DATUM TRANSFORMATION.

**TOPOGRAPHIC SURVEY**  
OF A PORTION OF GREENWICH DRIVE,  
TENNIS COURT AREA AND 1  
OF GREENWICH DRIVE  
SURVEYED FOR

**BATTLE LAW FIRM, LLC**

LOCATED IN THE CITY OF GEORGETOWN,  
GEORGETOWN COUNTY, SOUTH CAROLINA  
DATE: DECEMBER 23, 2021

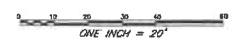
**Parker Land Surveying, LLC**  
100 Church Street  
Georgetown, SC 29140  
Phone: (803) 534-4100  
Fax: (803) 534-1779

I HEREBY STATE TO THE BEST OF MY KNOWLEDGE AND BELIEF, THE INFORMATION AND DATA SHOWN HEREON WAS MADE IN ACCORDANCE WITH THE REQUIREMENTS OF THE AMERICAN STANDARD MAPS AND THE PRACTICE OF LAND SURVEYING IN THE STATE OF SOUTH CAROLINA AND BASED ON SPECIFIC MEASUREMENTS FOR A CLASS II SURVEY AS SPECIFIED IN SECTION 17-2-10.

**GEORGE F. CLARKE**  
SURVEYOR  
No. 033814  
SOUTH CAROLINA  
No. 033814



R-0911



PLAINTIFF'S  
EXHIBIT  
47



Christmas-00042



Christmas-000043



Christmas-000044



Christmas-000045



Christmas-000046



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Christmas-000048



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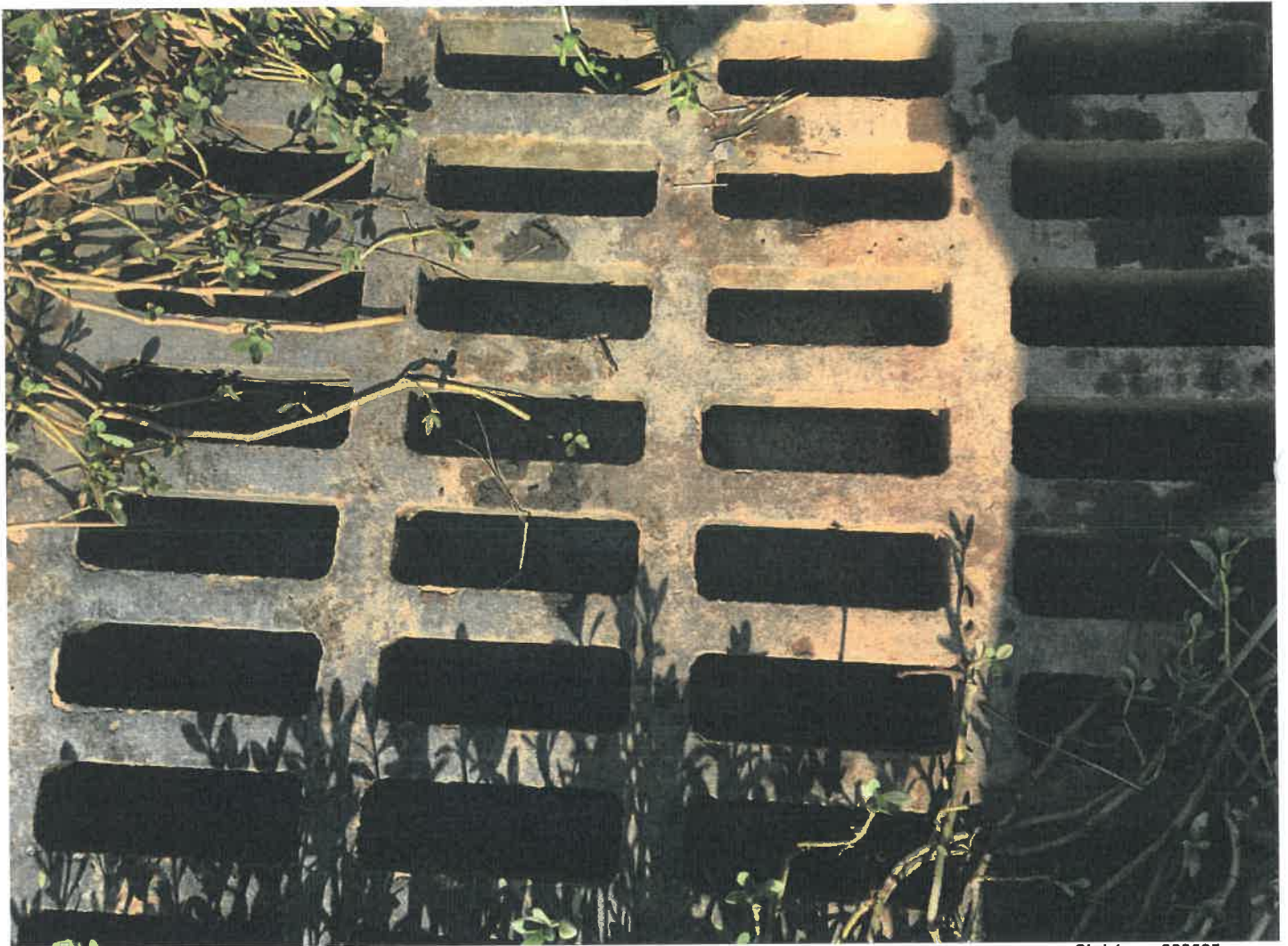
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Christmas-000063



Christmas-00064



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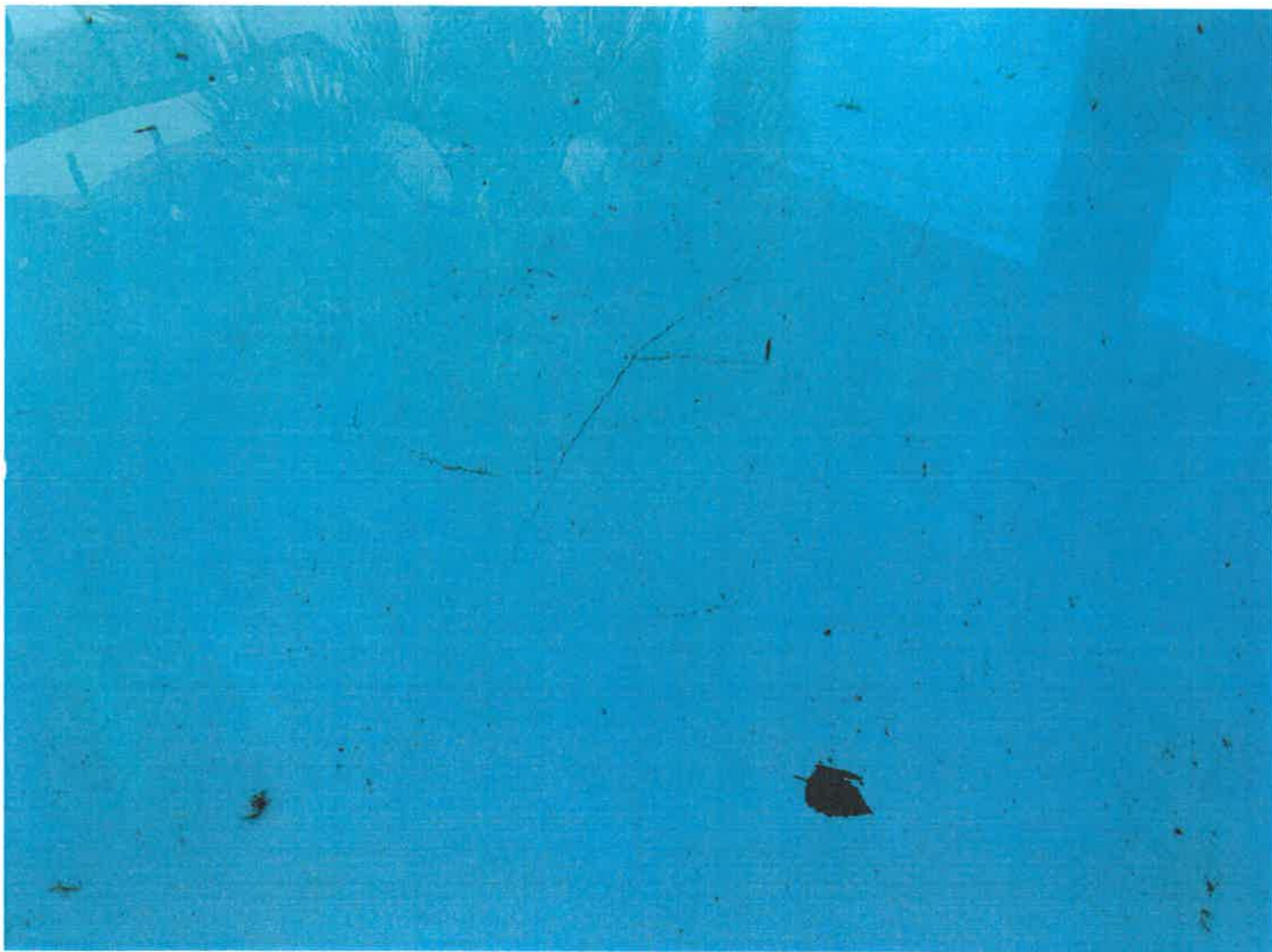


Christmas-000066

R-0936



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Christmas-000070

R-0940





Christmas-000072



Christmas-000073



Christmas-000074



Christmas-000075

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Christmas-000077



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Christmas-000081



Christmas-000082



Christmas-000083

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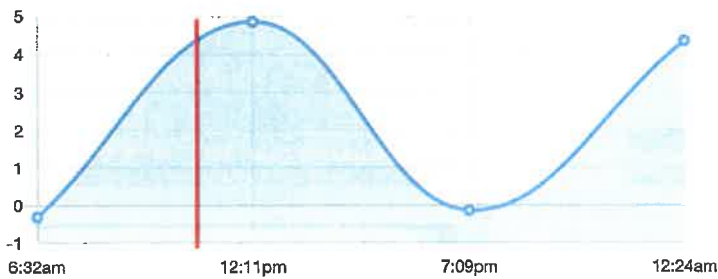
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### Tides in Georgetown, SC for Today & Tomorrow



The tide now in Georgetown, SC is rising. Next high tide is 12:11 pm. Next low tide is 7:09 pm. Sunset today is 7:06 PM. Sun rise tomorrow is 7:13 AM. The moon is Waxing Crescent tonight.

[Monthly](#)   [Weather](#)

**Weather Alerts**

Coastal Flood Advisory issued October 01 at 6:58AM EDT until October 01 at 11:00AM EDT by NWS

[DETAILS](#)

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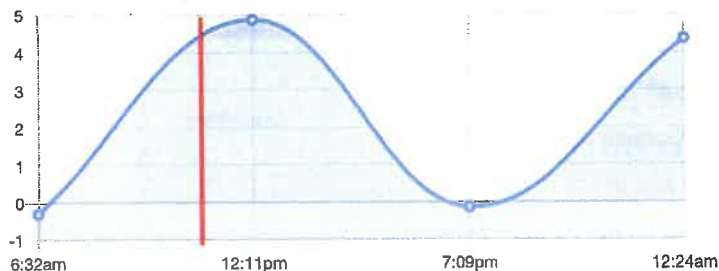
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### Tides in Georgetown, SC for Today & Tomorrow



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**Monthly Tide Chart**  
In Georgetown, SC



**Weather**  
In Georgetown, SC



**Maps & Charts**  
In Georgetown, SC



**Events**  
In Georgetown, SC

**Weather Alerts**

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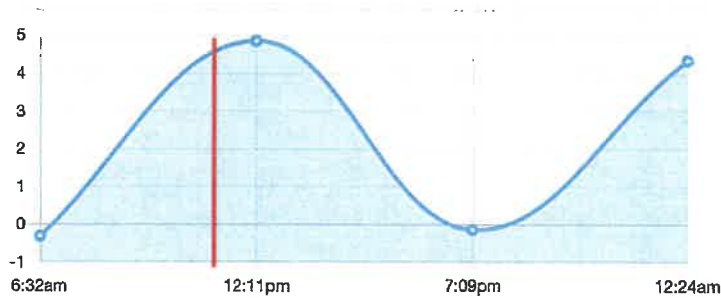
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Christmas-000093



### Tides in Georgetown, SC for Today & Tomorrow



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**Monthly Tide Chart**  
In Georgetown, SC

**Weather**  
In Georgetown, SC

**Weather Alerts**

Coastal Flood Advisory issued October 01 at 6:58AM EDT until October 01 at 11:00AM EDT by NWS

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# EAST BAY TENNIS COURTS



Owner

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Georgetown, SC

LANDSCAPE ARCHITECT / CIVIL ENGINEER



NORTH CHARLESTON, SC

SITE ELECTRICAL

CHARLESTON ENGINEERING  
CHARLESTON, SC

GENERAL CONTRACTOR



GEORGETOWN, SC

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Christmas-000096



Christmas-000097



Christmas-000098



Christmas-000099



Christmas-000100



Christmas-000101



Christmas-000102



Christmas-000103



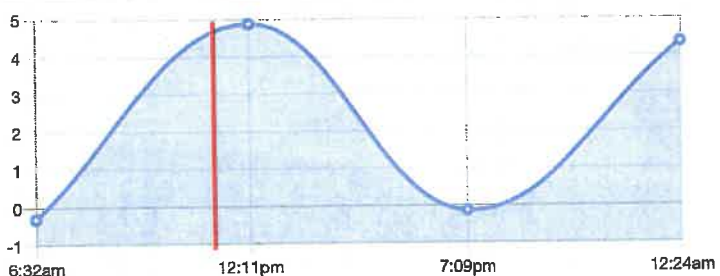
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## Tides in Georgetown, SC for Today & Tomorrow



The tide now in Georgetown, SC is rising. Next high tide is 12:11 pm. Next low tide is 7:09 pm. Sunset today is 7:06 PM. Sun rise tomorrow is 7:13 AM. The moon is Waxing Crescent tonight.



**Monthly Tide Chart**  
In Georgetown, SC



**Weather**  
In Georgetown, SC



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Christmas-000109



Christmas-000110



Christmas-000111



Christmas-000112



Christmas-000113



Christmas-000114



Christmas-000115

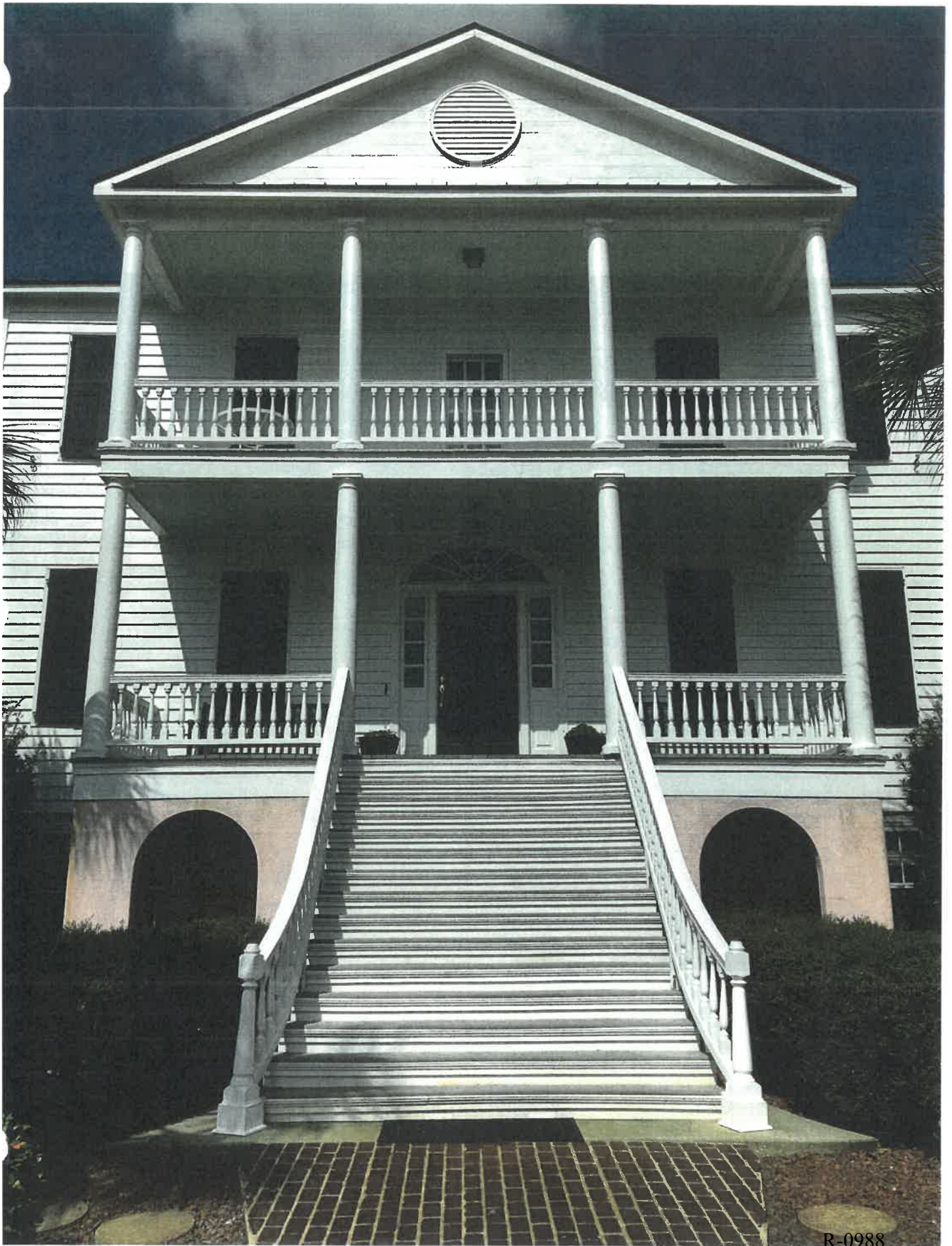


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Christmas-000117

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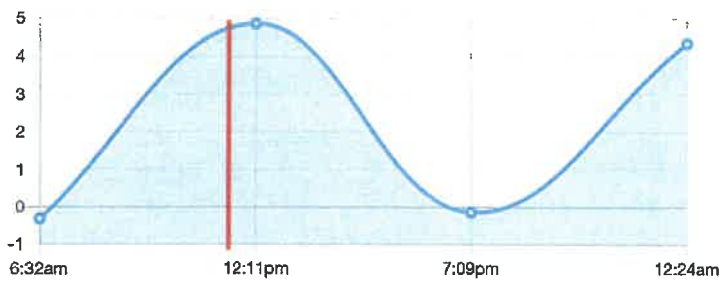
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Christmas-000121



### Tides in Georgetown, SC for Today & Tomorrow



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**Blunder #10: Mismanaging Retirement**

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Christmas-000124

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Christmas-000131



Christmas-000132



Christmas-000133

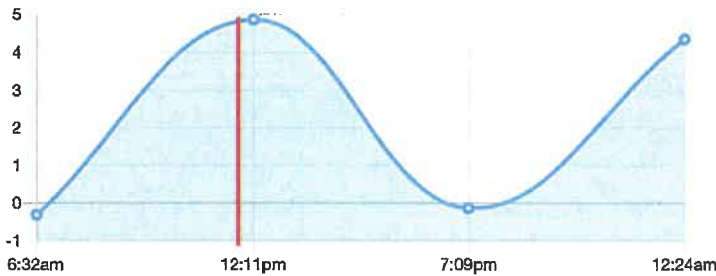


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## Tides in Georgetown, SC for Today & Tomorrow



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**Monthly Tide Chart**  
In Georgetown,



**Weather**  
In Georgetown, SC



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Christmas-000137



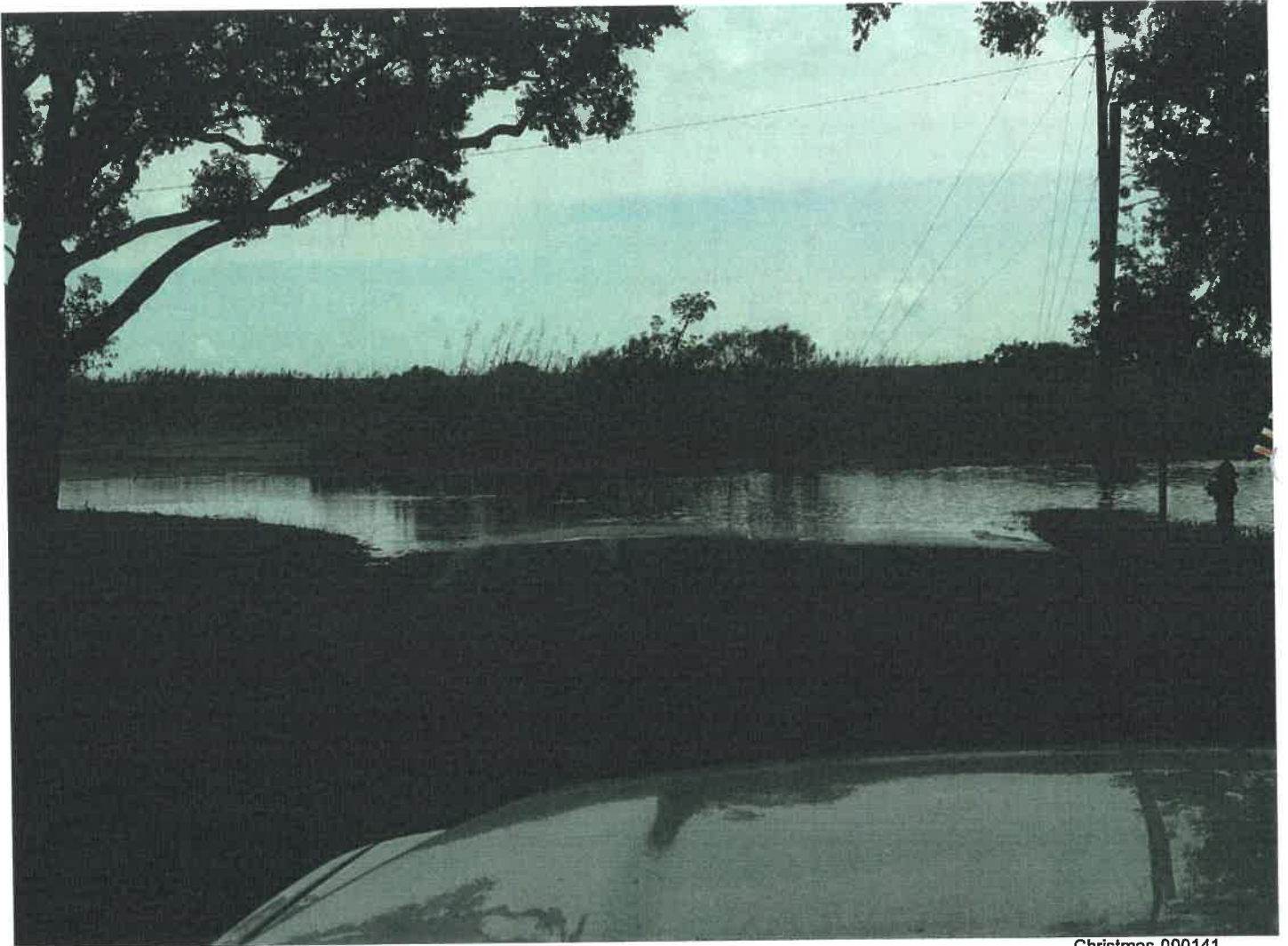
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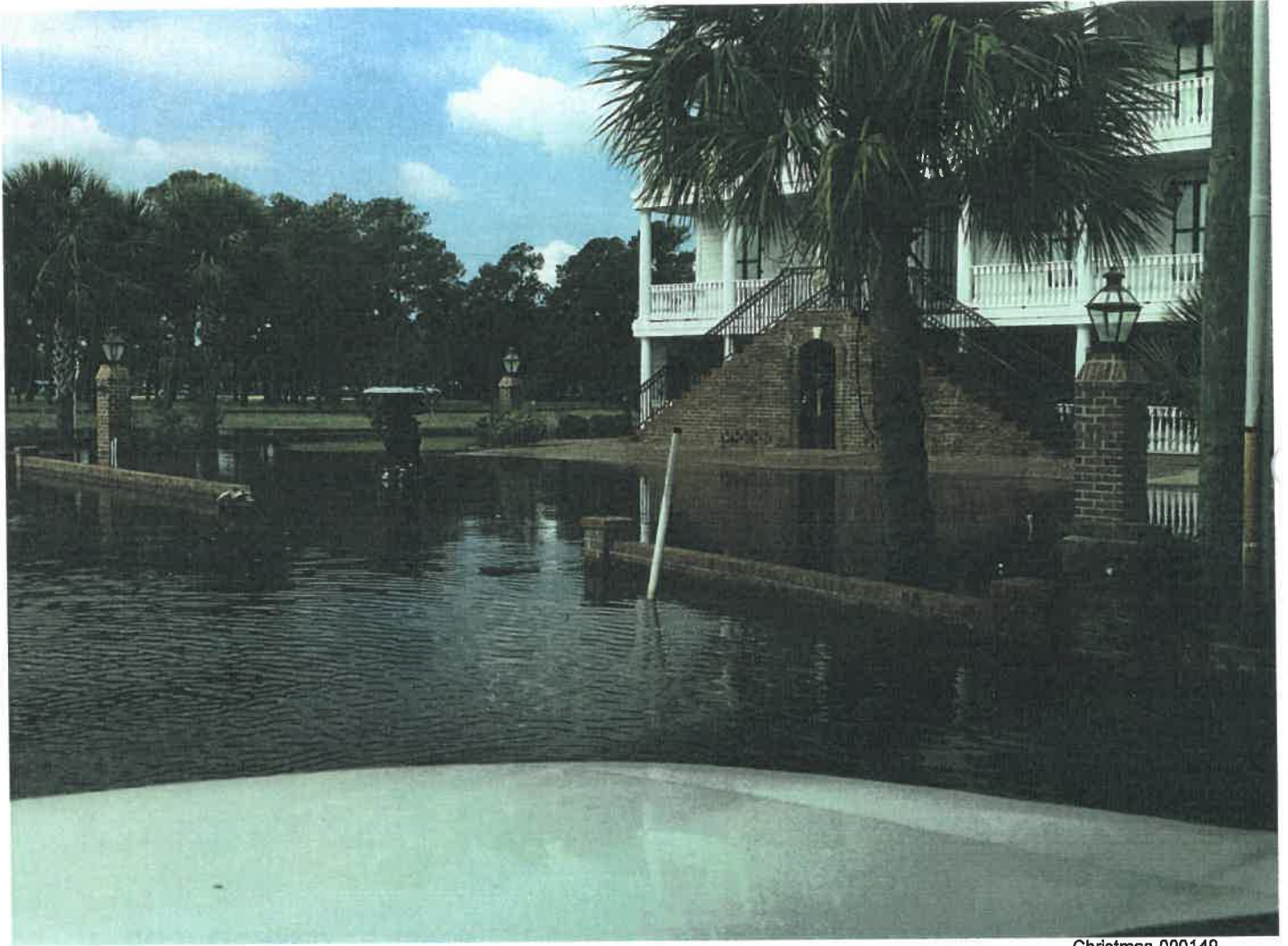
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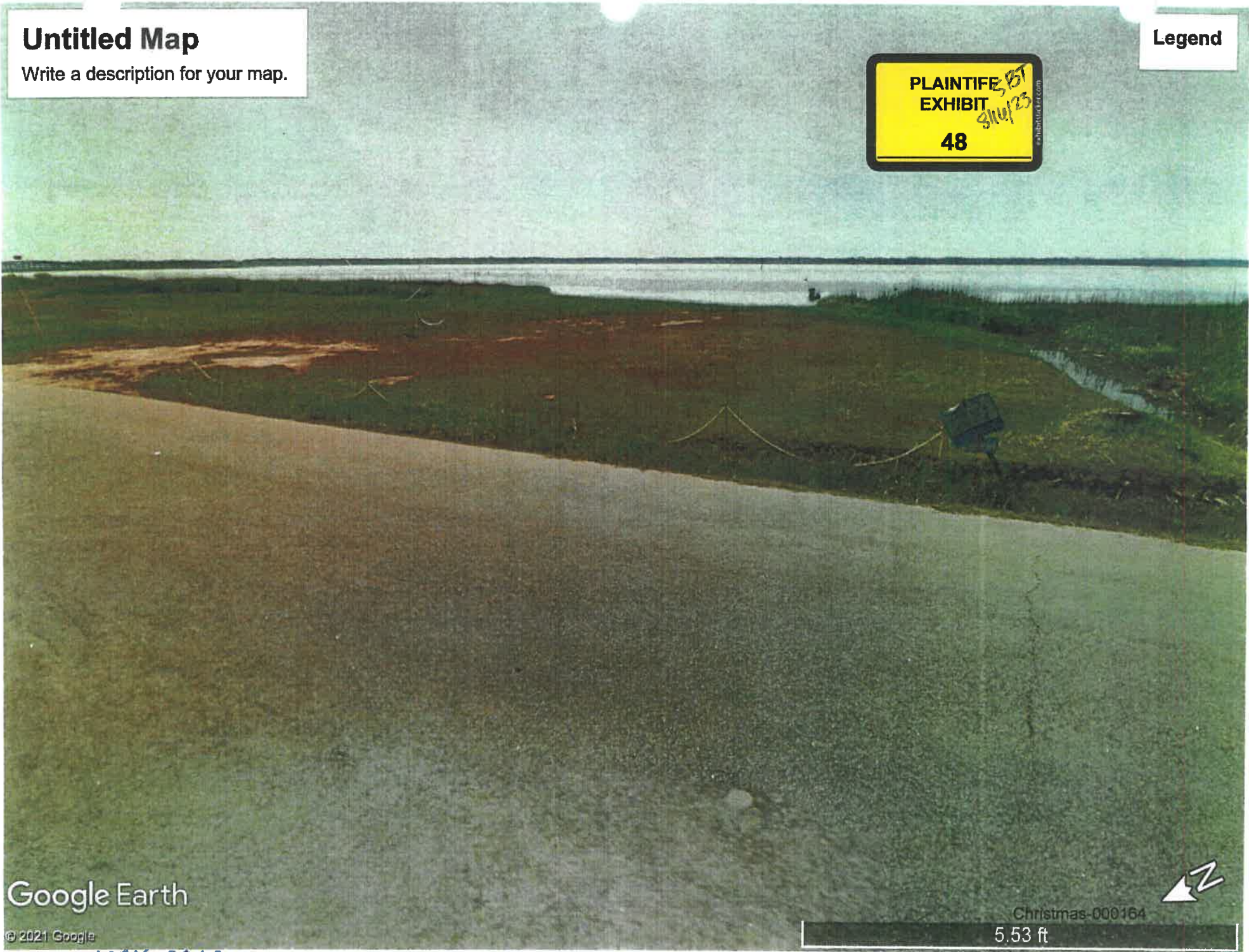
Christmas-000161

# Untitled Map

Write a description for your map.

Legend

PLAINTIFF <sup>5/13</sup>  
EXHIBIT <sup>3/14/13</sup>  
48



Google Earth

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MAY 2013

Christmas-000164

5.53 ft



R-1032

# Untitled Map

Write a description for your map.

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MAY 2013

Christmas-000165

6.25 ft



R-1033



Christmas-000166



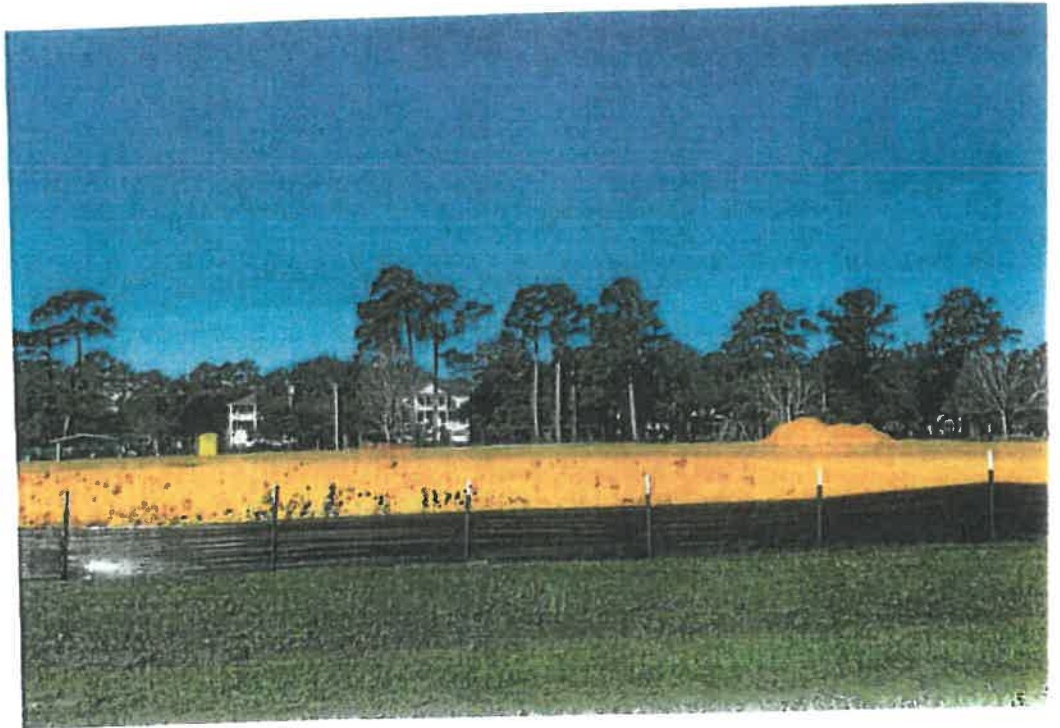
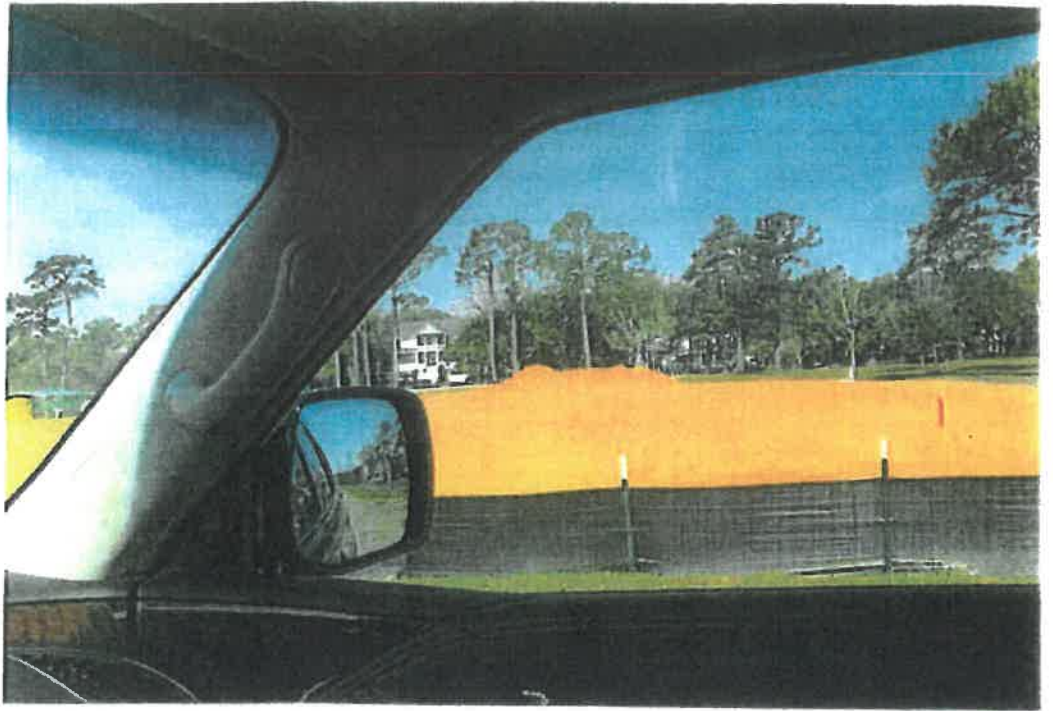
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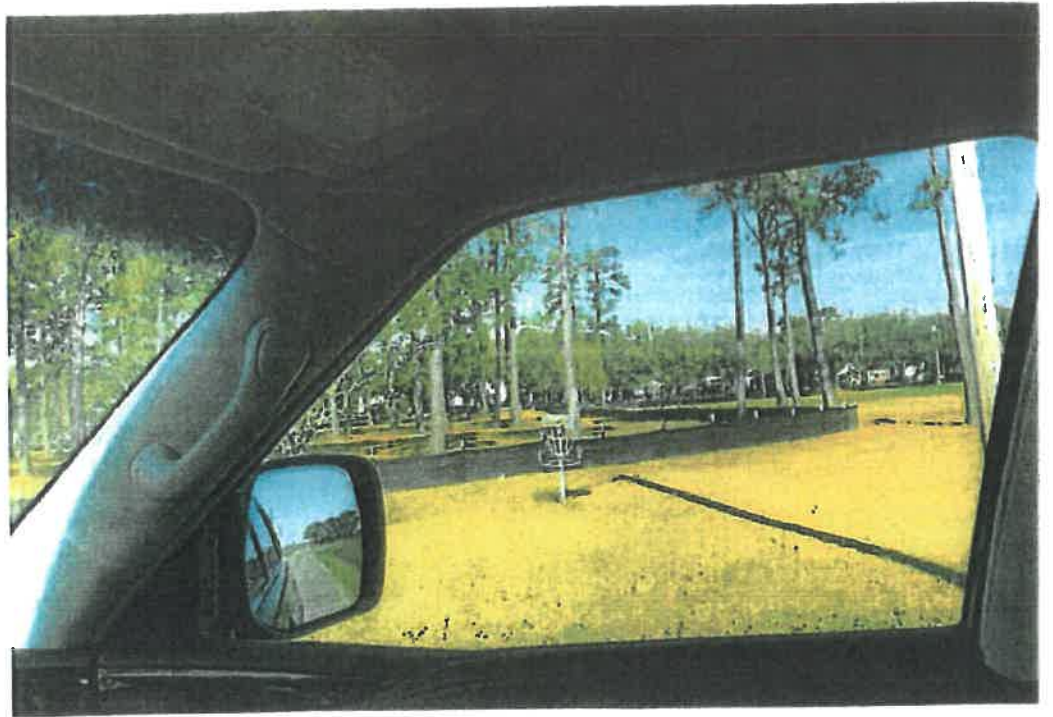
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Christmas-000177

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Christmas-000179

R-1047



Christmas-000180

R-1048



Christmas-000181

R-1049



PLAINTIFF SBT  
 EXHIBIT 9/14/23  
 49

**Legend**





- SW Pipes
- SW Manholes
- Ditch
- Swale





Christmas-000163

**Legend**

-  SW Pipes
-  SW Manholes
-  Ditch
-  Swale





DISCLAIMER: This plan is a conceptual representation of the proposed project and does not constitute a contract.