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December 18, 2024

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VIA E-MAIL ONLY

The Honorable Patricia A. Howard
Clerk of Court, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211
supctfilings@sccourts.org

RECEIVED

Dec 18 2024

S.C. SUPREME COURT

Re: Historic Beaufort Foundation, et al. v. City of Beaufort, et al.
Appellate Case No.: 2022-000300
Our File No.: 2371-1

Dear Ms. Howard:

Enclosed for filing in regard to the above-referenced matter, please find Petitioners' Petition for Writ of Certiorari and Proof of Service. In addition, please find a Memorandum to the HDRB from the Beaufort Community Development Director dated December 4, 2024, which is referenced in the Petition but not included in the Record on Appeal given its recent issue date. The Memorandum aids in demonstrating why the issues presented are novel questions of law. Given that, Petitioners respectfully request that the Court take it into consideration when reviewing our Petition for Writ of Certiorari. Please advise if we should file this Memorandum with the Petition or submit it to the Court by a different means.

The filing fee will be mailed to the Court today. If you have any questions, please do not hesitate to contact me.

With kind regards, I am

Sincerely,

WILLS MASSALON & ALLEN LLC

Carissa Steichen Land

Carissa Steichen Land
cland@wmalawfirm.net

CSL/cb

Enclosures

cc: The Honorable Jenny Abbot Kitchings
Ms. Cynthia Cole Jenkins
All Counsel of Record