

THE STATE OF SOUTH CAROLINA  
SOUTH CAROLINA COURT OF APPEALS

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APPEAL FROM BEAUFORT COUNTY  
COURT OF COMMON PLEAS

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**RECEIVED**

MAR 06 2025

SC Court of Appeals

Robert Bonds, Circuit Court Judge

APPELLATE CASE #: 2024-001984

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Mare Deckard

Appellant

v.

Town of Port Royal Zoning Board of Appeals

Respondent

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MOTION TO SUBMIT A REVISED DESIGNATION OF MATTER  
TO INCLUDE AN ADDITIONAL RELEVANT DOCUMENT

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Mare Deckard, *Pro Se*  
1006 Madrid Avenue  
Port Royal, South Carolina 29935  
Date: February 21, 2025

**Counsel of Record:**  
Thomas Bendle  
25 Rue Du Bois  
Beaufort, South Carolina 29907  
(843) 522-2400  
Attorney for Respondent.

Town of Port Royal Zoning Board  
PO Drawer 9  
Port Royal SC 29935

Pursuant to the letter from the Clerk dated February 11, 2025 the Appellant filed her Initial Brief and Designation of Matter within the time frame dictated by the Court.

By this Motion the Appellant attaches a revised Designation of Matter, as there is a relevant document [the August 28, 2024 Motion for Reconsideration) that should have been included. Therefore, the Appellant respectfully requests the Court accept the revised Designation and update the record accordingly.

A handwritten signature in black ink that reads "Mare Deckard". The signature is written in a cursive style with a long horizontal flourish extending to the left of the first letter.

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Mare Deckard, *Pro Se*  
1006 Madrid Avenue  
Port Royal, South Carolina 29935  
February 21, 2025

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Robert Bonds, Circuit Court Judge

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Appellant

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Respondent

DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

1. Plat, Phase 1 Village Renaissance
2. Aerial View of Phase 1 Alley
3. February 16, 2023 FOIA request Brooks Plank-Buccola
4. January 25, 2023 email from Thomas Bendle to Frampton Harper
5. January 2 and 3, 2024 texts between Mare Deckard and Noah Krepps
6. November 8, 2022 email from Noah Krepps to Thomas Bendle, Van Willis and Brooke Plank-Buccola
7. November 9, 2022 email from Thomas Bendle to Willis and Krepps
8. April 18, 2023 emails between Mare Deckard and Noah Krepps
9. Alley Deeds
10. January 10, 2024 FOIA request to Lisa Graham
11. January 11, 2024 email from Van Willis to Town Council
12. January 11, 2024 emails from the Fire Marshall and Fire Chief
13. Town of Port Royal Code section 2 for Alleys; section 5 for Fences; and 10 for Definitions
14. Deckard Zoning Board Appeal Power Point and Accompanying Exhibits

15. Zoning Board of Appeals Order
16. Certified Record on Appeal with Flashdrive of Hearing
17. Appeal to the Circuit Court
18. Memorandum in Support of Appeal
19. August 13, 2024 Circuit Court Appeal Hearing Transcript
20. Motion for Reconsideration
21. November 2, 2024 Motion for Reconsideration Hearing Transcript
22. Circuit Court Orders
23. Notice of Appeal to Supreme Court

I certify that this designation contains no matter which is irrelevant to this appeal.



Mare Deckard, *Pro Se*  
1006 Madrid Avenue  
Port Royal, SC 29935  
February 21, 2025

THE STATE OF SOUTH CAROLINA  
SOUTH CAROLINA COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY  
COURT OF COMMON PLEAS

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PROOF OF SERVICE

I certify I have served a copy of the Motion to Submit a Revised Designation of Matter to  
Include an Additional Relevant Document to the Clert of Court,  
and by United States mail, postage prepaid, to the Town of Port Royal Zoning Board and  
the counsel of record March 3, 2025.



Mare Deckard, *Pro Se*  
1006 Madrid Avenue  
Port Royal, South Carolina 29935  
Date: March 3, 2025

Counsel of Record:  
Thomas Allen Bendle Jr  
Howell, Gibson & Hughes  
PO Box 40  
Beaufort SC 29901-0040

Town of Port Royal Zoning Board  
PO Drawer 9  
Port Royal SC 29935

MARE DECKARD  
1006 Madrid Avenue  
Port Royal, South Carolina 29935  
(843) 592-1062  
Maremail59@yahoo.com

Sent via email February 21, 2025

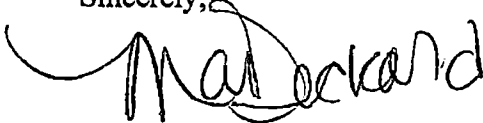
February 21, 2025

The Honorable Catherine S. Harrison  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211  
RE: Mare Deckard v. Town of Port Royal Zoning Board  
Appellate Case No.: 2024-001984

Dear Ms. Harrison:

Please see the attached Motion to Submit a Revised Designation of Matter to Include an Additional Relevant Document dated February 21, 2025. The Designation of Matter filed February 20, 2025 was missing an item. Please note I have copied the counsel of record.

Sincerely,

A handwritten signature in black ink that reads "Mare Deckard". The signature is written in a cursive, flowing style with a large initial "M".

Mare Deckard, *Pro Se*

Counsel of Record:  
Thomas Allan Bendle, Jr.

Attachment/Revised Designation of Matter