

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

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**Apr 01 2025**

**S.C. SUPREME COURT**

Appeal from Charleston County  
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2025-000394  
Circuit Court Case No. 2021-CP-10-00785

The Wolf Marie Vernon Trust,

Petitioner,

v.

The Town of Mount Pleasant and the Mount Pleasant Board of  
Zoning Appeals,

Respondents.

**PROOF OF SERVICE**

CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No.: 66468)  
Brian L. Quisenberry (SC Bar No.: 73637)  
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(843) 720-5488  
*Attorneys for Respondents*

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that the **MOTION FOR EXTENSION OF TIME TO FILE/SERVE RETURN TO THE PETITION FOR WRIT OF CERTIORARI** was served on all other parties to this appeal on April 1, 2025, via email (see attached) to their following counsel of record:

Thomas J. Rode (thomas@tktlawyers.com )  
Thurmond Kirchner & Timbes, P.A.  
15 Middle Atlantic Wharf  
Charleston, SC 29401  
Attorneys for Appellant

I also certify that Respondents' **MOTION FOR EXTENSION OF TIME TO SERVE/FILE PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** was filed with the South Carolina Court of Appeals on April 1, 2025, via email (see attached) to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Stephen L. Brown  
Stephen L. Brown (SC Bar No. 66468)  
Attorneys for Respondents

Charleston, South Carolina

April 1, 2025

## Bell, Pollyana (Polly)

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**From:** Bell, Pollyana (Polly)  
**Sent:** Tuesday, April 1, 2025 4:14 PM  
**To:** thomas@tktlawyers.com; kaitlyn@tktlawyers.com; michael@tktlawyers.com  
**Cc:** Brown, Stephen L.; Hines, Russell; Quisenberry, Brian; Justman, Aimee  
**Subject:** Wolfe Marie Vernon Trust v. Town of Mount Pleasant; Sup. Ct. Case No. 2025-000394, Ct. App. Case No. 2022-000392 (CR 210600)  
**Attachments:** Motion for Extension - 1st - Return to Petition for Writ.pdf

Enclosed please find Respondents' Motion for Extension of Time to File/Serve Return to Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell  
Project Assistant  
Commercial Litigation Practice Group  
Phone:(843)720-5488 | Fax:(843)579-1369



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