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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

Appeal from Marion County
Court of Common Pleas

The Honorable H. Steven DeBerry, IV, Circuit Court Judge 2771

Appellate Case No. 2024-000868
Civil Action No. 2023-CP-33-00500

Thomas Betancourt, Nicole Betancourt, Jimmy Boatwright, Arnie Boatwright, Norman Whetzel and
Kristana Whetzel.....Appellants,

v.

City of Mullins Zoning Board, Dr. Todd Blevins and Blevins Dentistry.....Respondents.

CERTIFICATE OF SERVICE

I, J. Rene Josey, Esquire of Turner, Padgett, Graham & Laney, P.A., counsel for the
Respondents Dr. Todd Blevins and Blevins Dentistry, hereby certify that I have served the Initial
Brief and Designation of Matter to be Included in the Record on Appeal upon all Pro Se Appellants
and counsel of record by US Mail and/or E-mail on this 9th day of April, 2025:

Nicole Betancourt
618 S. Main Street
Mullins, SC 29574
Pro Se Appellant

Thomas Betancourt
618 S. Main Street
Mullins, SC 29574
Pro Se Appellant

Jimmy Boatwright
107 E. Lloyd Street
Mullins, SC 29574
Pro Se Appellant

Arnie Boatwright
107 E. Lloyd Street
Mullins, SC 29574
Pro Se Appellant

Norman Whetzel
701 S. Main Street
Mullins, SC 29574
Pro Se Appellant

Kristana Whetzel
701 S. Main Street
Mullins, SC 29574
Pro Se Appellant

Hampton Grainger Tiller, Esq.
PO Box 653
Mullins, SC 29574
hampton@whittingontiller.com
*Co-Counsel for Respondents
Dr. Todd Blevins and Blevins
Dentistry*

John Paul "JP" Williams, Jr.,
Esq.
PO Box 883
Marion, SC 29571
jpwlawoffice@att.net
*Counsel for Respondent City of
Mullins*

/s/ J.Rene Josey, Esquire

Turner Padget

REPLY TO:

J. René Josey

E-Mail: JJosey@TurnerPadget.com
Writer's Direct Dial: (843) 656-4451
Writer's Direct Fax: (843) 413-5818

April 9, 2025

VIA EMAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

Re: Thomas Betancourt, Nicole Betancourt, Jimmy Boatwright, Arnie Boatwright, Norman Whetzel and Kristana Whetzel v. City of Mullins Zoning Board,
Dr. Todd Blevins and Blevins Dentistry
SCCA Action No.: 2024-000868
Civil Action No.: 2023-CP-33-00500
TPGL File No.: 20350.101

Dear Ms. Kitchings:

Pursuant to Section (b)(2) of the Supreme Court's Order RE: Methods of Electronic Filing and Service and Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing Respondents Dr. Todd Blevins and Blevins Dentistry's Initial Brief and Designation of the Matter to be included in the Record of Appeal. Please also find enclosed for filing, the Certificate of Counsel for Compliance with Rule 209 and the Certificate of Service for all of today's submissions. Please provide me with electronic filed copies of the same.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

s/ J. René Josey

J. René Josey

JRJ:alb

cc: Nicole Betancourt (via US Mail)
Thomas Betancourt (via US Mail)
Jimmy Boatwright (via US Mail)
Arnie Boatwright (via US Mail)
Norman Whetzel (via US Mail)

Letter to SC Court of Appeals

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Kristana Whetzel (via US Mail)
Hampton Grainger Tiller, Esq. (via E-Mail)
John Paul "JP" Williams, Jr., Esq. (via E-Mail)