

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

**RECEIVED**

**Apr 14 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)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina, 29401  
P.O. Box 993, Charleston, SC 29402  
(843) 720-5488  
*Attorneys for Respondents*

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Respondents, hereby certify that **RESPONDENTS' RETURN TO PETITION FOR WRIT OF CERTIORARI** was served on all other parties to this appeal on April 14, 2025, via email (see attached) to their following counsel of record:

Michael A. Timbes ([michael@tktlawyers.com](mailto:michael@tktlawyers.com))  
Thurmond Kirchner & Timbes, P.A.  
15 Middle Atlantic Wharf  
Charleston, SC 29401  
*Attorney for Petitioner*

I also certify that Respondents' **RESPONDENTS' RETURN TO PETITION FOR WRIT OF CERTIORARI** and **PROOF OF SERVICE** were filed with the South Carolina Court of Appeals on April 14, 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 14, 2025

## Bell, Pollyana (Polly)

---

**From:** Bell, Pollyana (Polly)  
**Sent:** Monday, April 14, 2025 5:01 PM  
**To:** 'thomas@tktlawyers.com'; 'kaitlyn@tktlawyers.com'; 'michael@tktlawyers.com'  
**Cc:** Brown, Stephen L.; Quisenberry, Brian; Hines, Russell; Justman, Aimee; Justman, Barbara  
**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:** Return to Petition for Writ of Cert.pdf

Enclosed please find Respondents' Return to Petition for Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

Legal Secretary to Stephen L. Brown,  
Russell G. Hines, Stephen A. Griffith, Jr.

**Commercial Litigation Practice Group**

Phone:(843)720-5488 | Fax:(843)579-1369



**CLEMENT RIVERS, LLP**

25 Calhoun Street • Suite 400 • Charleston, SC 29401  
ycrlaw.com