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Apr 23 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas
The Honorable J. MARK HAYES, II, Circuit Court Judge

Appellate Case No. 2024-000735

Spartanburg County and Cole Alverson in his Official Capacity
as County Administrator,Respondent,

v.

The Spartanburg County Board of Zoning Appeals, and Adam Washington Ballenger Camp #68,
Sons of Confederate Veterans, Inc.,

Of which The Spartanburg County Board of Zoning Appeals is a Respondent and Adam
Washington Ballenger Camp #68, Sons of Confederate Veterans, Inc. is theAppellant.

MOTION TO FILE SUPPLEMENTAL RECORD ON APPEAL

Appellant Adam Washington Ballenger Camp #68, Sons of Confederate Veterans, Inc., by and through their undersigned counsel, hereby moves the Court for leave to file a Supplemental Record on Appeal pursuant to Rule 212(b), SCACR. The documents that Appellant moves to supplement are already included on Appellant’s previously filed Designations of Matter. The documents to be included in the Supplement Record on Appeal were inadvertently left out of the previously filed record. The documents Appellant moves to include are as follows: Response to Petitioner’s Petition for Appeal filed in the Spartanburg County Court of Common Pleas, May 23, 2023 – Exhibit E; Affidavit of Jesse Jones, May 4, 2023 (#2); and Email from David Wood,

President, Spartanburg County Historical Association (“SCHA”) to James Crocker, Member, Adam Washington Ballenger Camp, August 17, 2022.

For clarification purposes, Response to Petitioner’s Petition for Appeal filed in the Spartanburg County Court of Common Pleas, May 23, 2023 – Exhibits A-D were included in the previously filed record, but Exhibit E needs to be added to the record. These exhibits are also the exhibits of the Board of Zoning Appeals Hearing Transcript, January 31, 2023 which is included in previously filed record. Affidavit of Jesse Jones, May 4, 2023 (#1) was included in the previously filed record but Affidavit of Jesse Jones, May 4, 2023 (#2) was inadvertently left out. Email from David Wood, President, Spartanburg County Historical Association (“SCHA”) to James Crocker, Member, Adam Washington Ballenger Camp, August 17, 2022, is being included to substitute the previously included email chain found at R. pp. 624-625.

For the forgoing reason, Appellant respectfully moves this Court to grant their motion allowing them to supplement the Record on Appeal with the proposed documents.

Respectfully Submitted,

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April 22, 2025

Attorneys for Appellant

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CERTIFICATE OF FILING AND SERVICE

I certify that I have served a copy of Appellant’s Motion to File Supplemental Record on Appeal
and Supplemental Record on Appeal, electronically to the Court of Appeals, at
ctappfilings@sccourts.org, and to the following attorneys of record for the Respondents to the
following electronic addresses, on this date April 23, 2025.

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