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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.

RETURN TO APPELLANT’S MOTION TO STRIKE PORTIONS OF BLEVINS BRIEF

Pursuant to Rule 240(e), SCACR, the Blevins Respondents make this return to Appellants’ Motion to Strike portions of the Blevins’ Brief. Appellants Motion suggest that the Blevins Respondents cannot advocate for an affirmance of the City’s BZA decision in this case because the undersigned counsel does not represent the City. *The Appellants are wrong and are again wasting the Court’s time and the Blevins Respondents’ money.* (The City perhaps wisely avoiding such expense).

Florence, South Carolina

TURNER, PADGET, GRAHAM & LANEY, P.A.

April 22, 2025

s/ J. Rene Josey
J. René Josey (S.C. Bar #3230)
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ATTORNEYS FOR RESPONDENTS
DR. TODD BLEVINS AND BLEVINS DENTISTRY

STATE OF SOUTH CAROLINA
COUNTY OF MARION

IN THE COURT OF COMMON PLEAS
C/A # 2023-CP-33-00500

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

Appellants,

vs.

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

Respondents.

CERTIFICATE OF SERVICE

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The undersigned employee of Turner, Padgett, Graham & Laney, P.A does hereby certify that service of the Respondents Dr. Todd Blevins and Blevins Dentistry's Return to Appellant's Motion to Strike Portions of Blevins Brief in the above-captioned matter was made upon all parties by US Mail and/or E-mail on this 22nd day of April, 2025:

Nicole Betancourt
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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

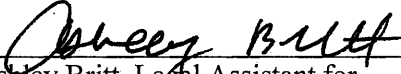
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J. René Josey

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April 22, 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 Whetzle 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 Return to Appellant's Motion to Strike Portions of Blevins Brief and the corresponding Certificate of Service. 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)
Kristana Whetzel (via US Mail)

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