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SC Court of Appeals

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

Appeal from Charleston County
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2016-CP-10-02955
Appellate Case No. 2021-000272

TCC of Charleston, Inc.,

Appellant/Respondent,

v.

Concord and Cumberland, LLC, Concord & Cumberland HPR, Leo Hall, Diane Hall, Bea H. Smith, Margaret C. Pope, William D. Foster, Jr., Gene G. Foster, Mattison J. MacGillivray, Teresa MacGillivray, Pamela L. Vaughn, Nelia A. Patricio, Trustee of the Nelia A. Patricio Revocable Trust Agreement, Stuart D. Reeves, Edward T. Strom, Barbara K. Henderson, James R. Clarke, Paul A. Brim, Robert K. Seidl, Jennifer M. Seidl, Robert Kenneth Seidl, II, M. Bert Storey, Thomas R. Mather, Edward T. Strom, 304 Concord & Cumberland, LLC, Marion M. Simpson f/k/a Marion Moore McDonald Simpson, Kathy Gardner, Gregory J. Gardner, Freeman Waterfront Properties, LLC, Jo-Ann Cooper, Betty Y. Segal, Robert M. Levin, and Bonita K. Levin, Donald D. Leonard, Betty L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas R. Debnam,

Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

**RESPONDENT BETTY L. BEATTY'S RETURN
TO APPELLANT/RESPONDENT TCC OF CHARLESTON, INC.'S
PETITION FOR REHEARING**

CLEMENT RIVERS, LLP
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Attorneys for Respondent Betty L. Beatty

By and through her undersigned counsel, pursuant to Rule 221(a), SCACR, and the Court's letter of May 19, 2025, Respondent Betty L. Beatty ("Mrs. Beatty") submits this return to Appellant/Respondent TCC Of Charleston, Inc.'s ("TCC") petition for rehearing ("TCC's Petition"), contending most respectfully that the Court should deny the same.

ARGUMENT

1. Mrs. Beatty adopts and incorporates the HPR's¹ return to TCC's Petition.

Mrs. Beatty hereby adopts and incorporates all arguments for denial of TCC's Petition set forth in the HPR's return to TCC's Petition.

CONCLUSION

For the foregoing reasons, along with any other or further reason(s) set forth in her appellate brief already on file, the entirety of which she hereby adopts and incorporates herein by reference and reiterates/reasserts in support hereof, Mrs. Beatty asks this Honorable Court to deny TCC's Petition.

<SIGNED ON THE FOLLOWING PAGE>

¹ The "HPR" refers to all Respondents/Appellants, i.e., all Respondents other than Mrs. Beatty.

Respectfully Submitted,
CLEMENT RIVERS, LLP

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Charleston, South Carolina

June 9, 2025

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Respondents,

Of which Concord & Cumberland HPR is the

Respondent/Appellant.

PROOF OF SERVICE

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Attorneys for Respondent Betty L. Beatty

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Respondent Betty L. Beatty, certify that **RESPONDENT BETTY L. BEATTY'S RETURN TO APPELLANT/RESPONDENT TCC OF CHARLESTON, INC.'S PETITION FOR REHEARING** was served on all other parties to this matter on June 9, 2025, via email (see attached) to their counsel of record:

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Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
Attorneys for Respondent Betty L. Beatty

Charleston, South Carolina

June 9, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Monday, June 9, 2025 12:26 PM
To: Jaan Rannik; Angela Gross; Ford, Cordes; Grimball, Henry; Walden, Andrew; Casey, Carol; mendemann@clarksonwalsh.com
Cc: 'Hines, Russell'; 'Buckley, Edward D. (Ed)'; Justman, Aimee
Subject: TCC of Charleston, Inc. v. Concord and Cumberland, LLC; Appellate Case No. 2021-000272 (CR 160538)
Attachments: TCC v. Concord (21-000272) -Motion for Leave to File Return to Petition for Rehearing Out of Time.pdf; TCC v. Concord (21-000272) -- Respondent Betty L. Beatty's Return to TCC's Petition for Rehearing.pdf

Enclosed please find Respondent Betty L. Beatty's Motion for Leave to Serve/File their Return to Petition for Rehearing Out of Time **and** Return to Appellant/Respondent TCC of Charleston's Inc.'s Petition for Rehearing 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.

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