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**Jul 11 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM MARION COUNTY  
Court of Common Pleas

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

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Appellate Case No. 2024-000868  
Case No. 2023CP3300500

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Thomas & Nicole Betancourt, Jimmy & Amie Boatwright, and Norman & Kristina  
Whetzel.....Appellant(s),  
v.

City of Mullins Zoning Board and Dr. Todd Blevins of Blevins  
Dentistry.....Respondent(s)

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PROOF OF SERVICE

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I, Nicole Betancourt, *Pro Se Appellant*, do hereby certify that the service of the Amended Record on Appeal and Certificate of Appellants, in the above captioned matter, was made upon counsel by way of Email and Certified Mail on this 10<sup>th</sup> day of July, 2025.

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July 10, 2025

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July 10, 2025

**VIA EMAIL and CERTIFIED MAIL (w/ Enclosure)**

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RE: THOMAS & NICOLE BETANCOURT, JIMMY & AMIE BOATWRIGHT AND NORMAN & KRISTINA WHETZEL, Appellants, v. CITY OF MULLINS ZONING BOARD AND DR. TODD BLEVINS OF BLEVINS DENTISTRY, Respondents  
Appellate Case No: 2024-000868  
Case No: 2023CP3300500

Dear Mr. Josey,

Appellants are in receipt of your letter dated July 3, 2025 and have updated our Record on Appeal to include Respondents' Designation of Matter items 3, 4 and 5. Your "demand" was unnecessary, as just requesting would garner the same result.

In early January 2025, Appellants filed their Designation of Matter, with all material proposed to be included in the Record on Appeal. **Rule 209 of the South Carolina Appellate Court Rules**, specifically states that opposing Counsel has the right to review and object to any material Appellants are proposing to include. Counsel did NOT object to any material proposed seven (7) months ago that was filed with Counsel and the Appellate Court. The initial designation period has passed without objection.

Secondly, **Rule 210(c) Content** clearly reads "...When a portion of an Order, judgment, decision or pleading shall be included in the Record on Appeal, the entire order, judgment decision or pleading shall be included in the Record..."

For these reasons set forth above, we will not be removing the "Appellants 7/8/24 Reply to Respondents Memorandum Opposing Supersedeas with Exhibits" and the Amended Record on Appeal remains intact.

Respectfully,

*/s/ Thomas Betancourt*  
*/s/ Nicole Betancourt*

*/s/ Jimmy Boatwright*  
*/s/ Amie Boatwright*

*/s/ Norman Whetzel*  
*/s/ Kristina Whetzel*

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