

REPLY TO:

J. René Josey

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July 16, 2025

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Re: Motion to Amend the Record on Appeal  
Thomas Betancourt, et al. v. City of Mullins Zoning Board, Dr. Todd Blevins and  
Blevins Dentistry  
SCCA Action No.: 2024-000868  
TPGL File No.: 20350.101

Dear Appellants:

Pursuant to the court's correspondence to you dated July 16, 2025, please file a Motion to Amend the Record on Appeal so that the Court will accept the Amended Record on Appeal whereby you added the documents that were designated by Respondents. As noted, the filed and accepted Record was non-compliant and the Amended Record (submitted) has been relied upon in preparing Respondent's Final Brief.

Sincerely,

TURNER PADGET GRAHAM & LANEY P.A.

J. René Josey

JRJ:alb

cc: Chief Deputy Clerk, South Carolina Court of Appeals (via email)  
Hampton Grainger Tiller, Esq. (via email)  
John Paul "JP" Williams, Jr., Esquire (via email)