

**RECEIVED**

**Jul 21 2025**

**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  
Case No. 2023-CP-33-00500

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)

**MOTION TO ACCEPT APPELLANTS AMENDED RECORD ON APPEAL**

Appellants Thomas & Nicole Betancourt, Jimmy & Amie Boatwright and Norman & Kristina Whetzel respectfully move the Court to enter an Order to accept the Amended Record on Appeal filed with the Clerk of Court on July 11, 2025.

Per Rule 210(c) of the South Carolina Appellate Court Rules, the Record on Appeal shall include all matter designated to be included by any party under Rule 209. Appellants inadvertently omitted items 3, 4 and 5 of the Respondents Designation of Matter in the original Record on Appeal. The Amended Record on Appeal has been updated to include all matter designated to be included by all parties.

For the Appellate Court to render an accurate decision, it is crucial for the Court to accept the Amended Record on Appeal to ensure complete and thorough understanding

of this case.

Accordingly, we respectfully request this Court enter an Order to accept the Amended Record on Appeal already filed on July 11, 2025.

July 16, 2025

By: /s/ Thomas Betancourt & Nicole Betancourt

Thomas & Nicole Betancourt, Pro Se Appellants  
618 S Main Street  
Mullins, SC 29574  
chapnicoleb@gmail.com  
(843) 561-3253

/s/ Jimmy Boatwright & Amie Boatwright

Jimmy Boatwright & Amie Boatwright, Pro Se Appellants  
107 E Lloyd Street  
Mullins, SC 29574  
Amieboatwright@gmail.com  
(843) 289-1323

/s/ Norman Whetzel & Kristina Whetzel

Norman Whetzel & Kristina Whetzel, Pro Se Appellants  
701 S Main Street  
Mullins, SC 29574  
Kristina.shaw@gmail.com  
(571) 235-8634

**RECEIVED**

**Jul 21 2025**

**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  
Case No. 2023CP3300500

---

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)

---

PROOF OF SERVICE

---

I, Nicole Betancourt, *Pro Se Appellant*, do hereby certify that the service of the Motion to accept the Amended Record on Appeal, in the above captioned matter, was made upon counsel by way of E-mail only on this 19<sup>th</sup> day of July, 2025.

Hampton Tiller, Esquire  
PO Box 653  
Mullins, SC 29574  
[hampton@whittingontiller.com](mailto:hampton@whittingontiller.com)  
(843)464-7821  
*Counsel for Todd Blevins*

J. Rene Josey, Esquire  
PO Box 5478  
Florence, SC 29502  
[JJosey@TurnerPadget.com](mailto:JJosey@TurnerPadget.com)  
(843)656-4451  
*Counsel for Todd Blevins*

JP Williams, Jr., Esquire  
PO Box 883  
Marion, SC 29571  
[jpwlawoffice@att.net](mailto:jpwlawoffice@att.net)  
(843)423-7630  
*Counsel for City of Mullins*

July 19, 2025

/s/ Nicole Betancourt  
Nicole Betancourt  
618 S Main Street  
Mullins, SC 29574  
[chapnicoleb@gmail.com](mailto:chapnicoleb@gmail.com)  
(843) 561-3253

**RECEIVED**

**Jul 21 2025**

**SC Court of Appeals**

July 19, 2025

**VIA E-MAIL AND USPS ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org))**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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 Ms. Kitchings:

Enclosed, please find Appellants Motion to Accept Amended Record on Appeal, for filing, and Proof of Service upon Counsel on July 19, 2025.

The \$50 Filing Fee has been sent via US Mail today.

If you have any questions, feel free to contact us.

Sincerely,

/s/ Nicole Betancourt

Nicole Betancourt  
618 S Main Street  
Mullins, SC 29574  
(843) 561-3253  
*Pro Se Appellant*

/s/ Amie Boatwright

Amie Boatwright  
107 E Lloyd Street  
Mullins, SC 29574  
(843) 289-1323  
*Pro Se Appellant*

/s/ Kristina Whetzel

Kristina Whetzel  
701 S Main Street  
Mullins, SC 29574  
(571) 235-8634  
*Pro Se Appellant*

cc via E-mail ONLY:

Hampton Tiller, Esquire  
PO Box 653  
Mullins, SC 29574  
[hampton@whittingtontiller.com](mailto:hampton@whittingtontiller.com)  
(843)464-7821  
*Counsel for Todd Blevins*

J. Rene Josey, Esquire  
PO Box 5478  
Florence, SC 29502  
[JJosey@TurnerPadget.com](mailto:JJosey@TurnerPadget.com)  
(843)656-4451  
*Counsel for Todd Blevins*

JP Williams, Jr., Esquire  
PO Box 883  
Marion, SC 29571  
[jpwlawoffice@att.net](mailto:jpwlawoffice@att.net)  
(843)423-7630  
*Counsel for City of Mullins*