

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APPEAL FROM MARION COUNTY
Court of Common Pleas

JUL 24 2025
SC Court of Appeals

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

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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 19th day of July, 2025.

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

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

JP Williams, Jr., Esquire
PO Box 883
Marion, SC 29571
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
(843) 561-3253

July 19, 2025

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JUL 24 2025

SC Court of Appeals

VIA E-MAIL AND USPS (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@whittingontiller.com
(843)464-7821
Counsel for Todd Blevins

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

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

Belancourt
618 S Main Street
N Mullins, SC 29574

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SC Court of Appeals

The Honorable Jenny Abbott Kitchens
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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