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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Honorable David P. Caraker, Jr., Circuit Court Judge

Appellate Case No. 2025-000066

Emanuel Stikas, Trustee of the Stikas Revocable Living Trust, dated February 1, 2023, d/b/a The Village Shops; Donald W. Reid and Katheryn W. Reid, husband and wife; Elizabeth Gattshall Hawkins Martin; and Tall House Farm, L.P.,.....Appellants,

v.

Georgetown County; David E. Tanner; RCB Land Holdings, LLC; and Magic Oaks, LLC,Respondents,

AND

Magic Oaks, LLC, Third Party Plaintiff,

v.

Keep It Green, Inc., Third Party Defendant.

**RESPONDENTS RCB LAND HOLDINGS, LLC AND MAGIC OAKS, LLC'S REPLY
TO APPELLANTS' RETURN**

BELLAMY, RUTENBERG, COPELAND,
EPPS, GRAVELY & BOWERS, P.A.
P.O. Box 357
Myrtle Beach, SC 29578
(843)448-2400
dmiller@bellamylaw.com
zcrowl@bellamylaw.com

Attorneys for Respondents RCB Land Holdings,
LLC and Magic Oaks, LLC

s/ Zachary J. Crowl

David B. Miller, SC Bar #10296
Zachary J. Crowl, SC Bar #103617

Myrtle Beach, South Carolina
September 10, 2025

Respondents seek expedited consideration of this appeal so that the case may be returned to the Circuit Court to proceed on the merits. Oddly, Appellants oppose this request even though they initiated this lawsuit. Why wouldn't Appellants want expedited consideration of this appeal?

Instead, Appellants prefer delay and suggest that this is the price Magic Oaks must pay for engaging in real estate development. Unfortunately, Appellants' position is not wholly unexpected. Appellants' Return is another example in a long list of actions taken to delay development and effect an injunction to the severe detriment of developers like Magic Oaks.¹

For the foregoing reasons and the reasons set forth in Respondents' Motion to Expedite, Respondents respectfully request that this Honorable Court expedite consideration of this appeal so that the case may proceed on the merits.

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¹ Attached hereto as Exhibit A and incorporated herein by reference is a list of the lawsuits filed on behalf of Keep It Green, Inc. to delay development in Georgetown County.

EXHIBIT A

Keep It Green Lawsuits to Delay Development

Michael T. Green, et al. v. Georgetown County, et al.

Civil Action No.: 2022-CP-22-00912

Dismissed on the pleadings by Judge Benjamin H. Culbertson.

Appealed by Plaintiffs. Appeal ongoing. Appellate Case No. 2024-000023.

Elizabeth M. Powers, et al. v. Georgetown County, et al.

Civil Action No.: 2023-CP-22-000007

Dismissed on the pleadings by Judge William H. Seals, Jr.

Appealed by Plaintiffs. Appeal ongoing. Appellate Case No. 2023-001306.

Kendrick Bryant, et al. v. Georgetown County, et al.

Civil Action No.: 2023-CP-22-00210

Dismissed on the pleadings by Judge Kristi F. Curtis.

Appealed by Plaintiffs. Appeal ongoing. Appellate Case No. 2023-001776.

Emanuel Stikas, et al. v. Georgetown County, et al. and Magic Oaks, LLC v. Keep It Green, Inc.

Civil Action No.: 2024-CP-22-00577

Defendants' Motion to Strike Granted by Judge David P. Caraker, Jr.

Appealed by Plaintiffs. Appeal ongoing. Appellate Case No. 2025-000066.