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Sep 18 2025

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT**

Appeal from Charleston County
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Case No. 2016-CP-10-02955

Court of Appeals Case No. 2021-000272

Supreme Court Case No. 2025-001715

TCC of Charleston, Inc.,

Petitioner/Respondent,

v.

Concord and Cumberland, LLC, Concord & Cumberland HPR, Leo Hall, Diane Hall, Bea H. Smith, Margaret C. Pope, William D. Foster, Jr., Gene G. Foster, Mattison J. MacGillivray, Teresa MacGillivray, Pamela L. Vaughn, Nelia A. Patricio, Trustee of the Nelia A. Patricio Revocable Trust Agreement, Stuart D. Reeves, Edward T. Strom, Barbara K. Henderson, James R. Clarke, Paul A. Brim, Robert K. Seidl, Jennifer M. Seidl, Robert Kenneth Seidl, II, M. Bert Storey, Thomas R. Mather, Edward T. Strom, 304 Concord & Cumberland, LLC, Marion M. Simpson f/k/a Marion Moore McDonald Simpson, Kathy Gardner, Gregory J. Gardner, Freeman Waterfront Properties, LLC, Jo-Ann Cooper, Betty Y. Segal, Robert M. Levin, and Bonita K. Levin, Donald D. Leonard, Betty L. Beatty, Mattellen, LLC, and Thomas R. Debnam, Trustee of the Trust Agreement of Thomas R. Debnam,

Respondents,

Of which Concord & Cumberland HPR and Betty L. Beatty are

Respondents/Petitioners.

PROOF OF SERVICE

CLEMENT RIVERS, LLP
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*Attorneys for Respondent/Petitioner
Betty L. Beatty*

I, Russell G. Hines, of Clement Rivers, LLP, counsel for Respondent/Petitioner Betty L. Beatty, certify that **BETTY L. BEATTY'S PETITION FOR A WRIT OF CERTIORARI** was served on all other parties to this matter on September 18, 2025, via email (see attached) to their counsel of record:

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I further certified that, on September 18, 2025, the aforementioned petition was filed via email in both the Supreme Court (suptfilings@sccourts.org) and Court of Appeals (ctappfilings@sccourts.org).

Respectfully submitted,
CLEMENT RIVERS, LLP

By: s/Russell G. Hines
Russell G. Hines (SC Bar No. 72100)
*Attorneys for Respondent/Petitioner
Betty L. Beatty*

Charleston, South Carolina

September 18, 2025

Bell, Pollyana (Polly)

From: Bell, Pollyana (Polly)
Sent: Thursday, September 18, 2025 2:54 PM
To: 'Jaan Rannik'; 'Angela Gross'; 'Ford, Cordes'; 'Grimball, Henry'; 'Walden, Andrew'; 'Casey, Carol'; 'mendemann@clarksonwalsh.com'
Cc: 'Hines, Russell'; 'Buckley, Edward D. (Ed)'; Justman, Aimee
Subject: TCC of Charleston, Inc. v. Concord and Cumberland, LLC; Sup. Ct. Case No. 2025-001715 // Ct. App. Case No. 2021-000272 (CR 160538)
Attachments: TCC v. Concord (2025-001715) -- Betty Beatty's Petition for a Writ of Certiorari.pdf

Enclosed please find Respondent Betty L. Beatty's Petition for a Writ of Certiorari for service upon you in the above-referenced matter.

Thank you,

Pollyana Bell

Legal Secretary to Stephen L. Brown,
Russell G. Hines, Stephen A. Griffith, Jr.

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