

**RECEIVED**

**Nov 18 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Mikell R. Scarborough  
Circuit Court Judge

Appellate Case No. 2025-001719

Henry Bailem, IV; Joseph Bailem; Shiela Bailem; Diane Jefferson;  
Michael Jefferson, Sr.; Rashica Coakley; and Ann Bailem  
Simmons, .....

Appellants,

v.

County of Charleston; Town of Mount Pleasant; DRB Group South  
Carolina, LLC f/k/a Dan Ryan Builders South Carolina, LLC;  
Marie P. Howard; Lewis B. Howard, Jr.; Lanelle P. Johnson;  
William Bailem, Sr.; X Syvier Lynn Johnson; Sonia Maria  
Simmons; Kenneth Davis; Juanita Nelson; Titus Howard; Myeisha  
Howard; James Howard; and John Doe and Jane Doe, fictitious  
names used herein to designate the unknown heirs at law,  
distributes, and/or devisees of all persons who are minors or  
members of the Armed Forces of the United States of America, as  
contemplated by the Soldiers' and Sailors' Relief Act, 1940, as  
Amended, and all persons entitled to claim under and through any  
of them, .....

Defendants,

of which

County of Charleston; Town of Mount Pleasant; and DRB Group  
South Carolina, LLC f/k/a Dan Ryan Builders South Carolina,  
LLC, are the .....

Respondents.

NOTICE OF APPEARANCE

Please enter the appearance of the below-signed counsel on behalf of Respondent Town of  
Mount Pleasant in this matter.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

By: /s/ M. Todd Carroll  
S.C. Bar No. 74000  
todd.carroll@wbd-us.com  
1221 Main Street, Suite 1600  
Columbia, SC 29201  
(803) 454-6504

Ashley Kutz Kelley  
S.C. Bar No. 78013  
ashley.kelley@wbd-us.com  
P.O. Box 999  
Charleston, SC 29401  
(843) 720-4679

TOWN OF MOUNT PLEASANT

David G. Pagliarini  
Town Attorney  
S.C. Bar No. 8850  
dpagliarini@tompssc.com  
James I. Ward, IV  
S.C. Bar No. 103777  
jward@tompssc.com  
100 Ann Edwards Lane  
Mount Pleasant, SC 29464  
(843) 849-2020

*Attorneys for Respondent Town of Mount Pleasant*

November 18, 2025

RECEIVED

Nov 18 2025

SC Court of Appeals

---

PROOF OF SERVICE

---

I, the undersigned of the law offices of Womble Bond Dickinson (US) LLP, attorneys for Respondent Town of Mount Pleasant, do hereby certify that I have served all parties to this appeal with a copy of the pleading(s) specific below by emailing them at the addresses below:

Pleading(s): Notice of Appearance

Parties Served:

W. Andrew Gowder, Jr. (andy@austengowder.com)

*Counsel for the Appellants*

Marc G. Belle (mbelle@charlestoncounty.org)

Bernard E. Ferrara, Jr. (bferrara@charlestoncounty.org)

Andrew L. Hethington (alhethington@charlestoncounty.org)

*Counsel for Respondent County of Charleston*

W. Taylor Stanley (taylor.stanley@arlaw.com)

Paul E. Sperry (paul@sperrylawsc.com)

*Counsel for Respondent DRB Group South Carolina, LLC f/k/a Dan Ryan Builders South Carolina, LLC*

By: /s/ M. Todd Carroll

November 18, 2025

M. Todd Carroll  
Direct Dial: 803.454.7730  
E-mail: todd.carroll@wbd-us.com

November 18, 2025

**Via Electronic Filing**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: First Request for Extension  
*Bailem et al. v. County of Charleston et al.*  
Appellate Case No. 2025-001719

Dear Madam Clerk:

We have been engaged by the Respondent Town of Mount Pleasant in the above-referenced appeal and have today filed our notice of appearance. Through this letter, we respectfully request that the Court extend the Respondents' deadline to file their initial briefs and designations of matter by 35 days in order to get this deadline beyond the holiday season. This is the first such requested extension. If granted, the Respondents' new deadline would be Wednesday, January 7, 2026.

We will submit the filing fee associated with this request within five days of this correspondence. We appreciate the Court's consideration of this request.

Best regards,

/s/ M. Todd Carroll

cc: All Counsel of Record