

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

APPEAL FROM OCONEE COUNTY

Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Appellate Case No. 2025-000790  
Case No. 2024-CP-37-00202

South Carolina Public Interest Foundation, Jim Mann, David Dial,  
Rachel Moore, Terri Meyerring, Carl Meyerring, Doug Muzik,  
Bruce Burrell, India Lancaster, John Wagner, Gwen McPhail,  
Lillian Lusk, and Linda Love,  
on behalf of all others similarly situated, Appellants-Respondents,

v.

Oconee County, Respondent-Appellant,

**SUPPLEMENT TO RECORD ON APPEAL**

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**RECEIVED**

**Feb 03 2026**

**S.C. SUPREME COURT**

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STATE OF SOUTH CAROLINA )  
COUNTY OF OCONEE )  
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behalf of all others similarly situated, )  
Plaintiffs, )  
v. )  
Oconee County, )  
Defendants. )

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IN THE COURT OF COMMON PLEAS  
IN THE 10<sup>TH</sup> CIRCUIT

CASE NO: 2024-CP-37-00202

**Plaintiff's Requests for Admission to  
the Defendant**

**NOW COME** the Plaintiffs, by their undersigned attorney, and request that the Defendant admit the following pursuant to SCRPC 36:

1. Admit that Oconee County implemented phases one and two of the sewer projects in the southern part of Oconee County without using bonded indebtedness that pledged the full faith and credit and taxing power of Oconee County.
2. Admit that City of Seneca implemented the sewer projects in the City of Seneca without using bonded indebtedness that pledged the full faith and credit and taxing power of Oconee County.
3. Admit that the City of Walhalla implemented the sewer projects in the City of Walhalla without using bonded indebtedness that pledged the full faith and credit and taxing power of Oconee County.
4. Admit that the City of Westminster implemented sewer projects in the City of Westminster without using bonded indebtedness that pledged the full faith and credit and taxing power of Oconee County.

5. Admit that the Keowee Key subdivision implemented sewer projects in the Keowee Key subdivision without using bonded indebtedness that pledged the full faith and credit and taxing power of Oconee County.
6. Admit that citizens living in the northern rural part of Oconee County will not be able to utilize the anticipated wastewater treatment plants and facilities planned for the southern part of Oconee County.
7. Admit that citizens living in the Town of Salem will not be able to utilize the anticipated wastewater treatment plants and facilities planned for the southern part of Oconee County.
8. Admit that the citizens living in Mountain Rest will not be able to utilize the anticipated wastewater treatment plants and facilities planned for the southern part of Oconee County.
9. Admit that the citizens living in Tamassee will not be able to utilize the anticipated wastewater treatment plants and facilities planned for the southern part of Oconee County.
10. Admit that the citizens living in Jocassee Ridge will not be able to utilize the anticipated wastewater treatment plants and facilities planned for the southern part of Oconee County.
11. Admit that the neighborhoods around Lake Jocassee in Oconee County are served by privately owned sewer systems and septic systems that were built without using the bonded indebtedness that pledge the full faith and credit taxing power of Oconee County.
12. Admit that Oconee County has not assessed any special fee or charge on any persons or businesses in the southern part of Oconee County to pay for the 2023 Bonds or the planned wastewater treatment facilities.
13. Admit that Oconee County has not created a special tax district to pay for the 2023 Bonds.
14. Admit that Oconee County ran sewer to the Golden Corner Commerce Park in 2014.
15. Admit that Oconee County graded the Golden Corner Commerce Park in 2015.

16. Admit that Oconee County recently committed more than \$2.9 million to regrade and provide improvements to the Golden Corner Commerce Park.
17. Admit that the Golden Corner Commerce Park has no industrial tenants.
18. Admit that since 2015 the Golden Corner Commerce Park has had no industrial tenants.
19. Admit the majority of 2023 Bond proceeds are intended to fund planned sewer or wastewater expansion projects beyond Phase II.
20. Admit that members of the public spoke out against moving forward with the 2023 Bond during the first, second, and third readings of the 2023-13 Bond Ordinance, and at the final hearing for the 2023 bond.
21. Admit that a spending plan for the 2023 Bond has not been presented to the public.
22. Admit that some members of County Council have not been presented with a spending plan for the 2023 Bond.

Respectfully submitted,  
**THE CARPENTER LAW FIRM, P.C.**



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Attorney for Plaintiffs

April 24, 2024

STATE OF SOUTH CAROLINA )  
COUNTY OF OCONEE )  
South Carolina Public Interest Foundation, Jim )  
Mann, David Dial, Rachel Moore, Terri )  
Meyerring, Carl Meyerring, Doug Muzik, Bruce )  
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IN THE COURT OF COMMON PLEAS  
IN THE 10<sup>TH</sup> CIRCUIT

CASE NO: 2024-CP-37-00202

**Plaintiff’s Requests for Production to  
the Defendant**

**NOW COME** the Plaintiffs, by their undersigned attorney, and submit the following Request for Production to the Defendant pursuant to SCRCP 34:

1. Produce all maps and charts related to any bond funded sewer or wastewater expansion considerations, including those showing the location of the proposed sewer lines, including all drawings, official or unofficial, by County employees.
2. Produce all documents related to the planning for the bond funded sewer or wastewater expansion project.
3. Produce all documents given to members of County Council related to the bond funded sewer or wastewater sewer expansion considerations and projects.
4. Produce all maps and charts related to the issuance of the 2023 bonds.
5. Produce all documents related to the application for or the issuance of 2023 bonds.
6. Produce all documents given to any member or members of County Council related to the issuance of 2023 bonds.
7. Produce all documents shown in any public venue related to the bond funded sewer or wastewater expansion considerations, or projects, and/or the 2023 bonds.

8. Produce all documents in the nature of a spending plan for the \$25 million bond proceeds.
9. Produce all documents relating or referring to a spending plan for the \$25 million bond proceeds.
10. Produce all engineering drawings showing an overview of the proposed sewer expansion.
11. Produce all documents referring to the “Sewer South” project and/or any bond funded sewer or wastewater expansion considerations and projects.
12. Produce all documents referring or relating to the “Phase 3” sewer expansion.
13. Produce all statements produced or issued by County Council related to the “Sewer South” project,
14. Produce all statements produced or issued by County Council related to any bond funded sewer or wastewater expansion considerations or projects, or the \$25 million bond project.
15. Produce all communications and documentation shared between or among County Council, County Administrator’s Office, Oconee County Office personnel, and/or the Oconee Joint Regional Sewer Authority related to the “Sewer South” project, or any bond funded sewer, or wastewater expansion considerations or projects, or the \$25 million bond project.
16. Produce all communications and documents between members of County Council, County Administrator’s Office, or County employees, and a newspaper known as “the Journal” related to the Sewer South project, or any bond funded sewer, or wastewater expansion considerations or projects, or the \$25 million bond project.
17. Produce all communications and documents between members of County Council, County Administrator’s Office, County Attorney’s office, County employees, and Mr. Jerry Edwards, Hal Welch, or any compensated associate or employee of the organization

known as “The Edwards Group,” with known holdings of Edwards Group Publishing, Eagle Publishing, and Edwards Land Management, related to the “Sewer South” project, or any bond funded sewer or wastewater expansion considerations or projects, or the \$25 million bond project.

18. Produce all communications and documents between Oconee County office personnel, members of Oconee County Council, and the law firm formerly known as King Kozlarek Law LLC, now identifying as King Kozlarek Root Law, related to the “Sewer South” project, any bond funded sewer or wastewater expansion considerations of projects, or the \$25 million bond project.
19. Produce any expert report that you have secured related to this case, the “Sewer South” project, any bond funded sewer or wastewater expansion considerations or projects, or the \$25 million bond project.
20. Produce any statements from witnesses related to this case, related to the “Sewer South” project, the sewer or wastewater expansion considerations, or the \$25 million bond project.
21. Produce all state & federal grant related documentation for planned funding of sewer and wastewater expansion considerations or projects beyond Phase II.
22. Produce all communications and documentation between members of County Council, County Administrator’s Office, or County employees and members of the registered agent for Hartland, LLC related to the Sewer South project, or any bond funded sewer, or wastewater expansion considerations or projects, or the \$25 million bond project.
23. Produce all communications and documentation between members of County Council, County Administrator’s Office, or County employees and members of the Oconee County

Planning Commission related to the Sewer South project, or any bond funded sewer, or wastewater expansion considerations or projects, or the \$25 million bond project.

Respectfully submitted,  
**THE CARPENTER LAW FIRM, P.C.**

A handwritten signature in black ink, appearing to read "J. Carpenter", written in a cursive style.

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IN THE COURT OF COMMON PLEAS  
IN THE 10<sup>TH</sup> CIRCUIT

CASE NO: 2024-CP-37-00202

**Plaintiff's Interrogatories to the  
Defendant**

**NOW COME** the Plaintiffs, by their undersigned attorney, and submit the following Interrogatories to the Defendant pursuant to SCRCP 33:

1. Give the names and addresses of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether written or recorded statements have been taken from witnesses and indicate who has possession of such statements.
2. Set forth a list of photographs, plats, sketches, or other prepared documents in the possession of Defendant that relate to its claims in this case.
3. Identify by name, address, and telephone number:
  - a. Each lay witness you intend to call at the trial of this case;
  - b. Each expert witness you intend to call at the trial of this case and the area of the witness's expertise;
  - c. Each expert consultant you or your attorneys have retained or specifically employed in anticipation of litigation or preparation for trial and whom you do not intend to call at trial; and

- d. Briefly state the substance of the conversation, whether oral or written, with any person referred to in subparts a or b above.
4. If any persons named in your answers to the previous Interrogatory have provided you written reports or written statements, identify them sufficiently to frame a Request for Production.
5. For each person known to Defendant, or legal counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the facts known to or observed by such witnesses, or provide a copy of any written or recorded statements, or any affidavits, taken from such witnesses, including parties to this matter.
6. Identify all persons who provided factual information for the answers to these Interrogatories.
7. Identify all known sewer systems in Oconee County and what geographic areas they serve.
8. Identify by name, address, and telephone number, every consultant hired by Defendant related to the issuance of the \$25 million in 2023 Bonds for wastewater improvements, or the proposed sewer services in Southern Oconee County.

Respectfully submitted,  
**THE CARPENTER LAW FIRM, P.C.**



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