

RECEIVED
Sep 21 2026
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Thomas J. Rode, Circuit Court Judge

Case No. 2024-CP-10-04208

Park Lane Partners, LLC, and Elizabeth Spratt Cooper, Respondents,

v.

City of Folly Beach, Appellant.

AMENDED NOTICE OF APPEAL

The City of Folly Beach appeals the order of the Honorable Thomas J. Rode, dated August 14, 2026, attached. Appellant received written notice of entry of the order August 14, 2026. The City of Folly Beach hereby provides an Amended Notice of Appeal including Judge Rode's Orders on Respondents' two Motions to Amend the original order. The two additional orders are dated August 27, 2026 and September 11, 2026, attached.

September 22, 2026

/s/ Joseph C. Wilson, IV
Joseph C. Wilson, IV (SC Bar No.: 63009)
City Attorney, City of Folly Beach
P.O. Box 178
Folly Beach, South Carolina 29439
Telephone: (843) 834-2390
Email: joe@follybeachlaw.com

/s/ Stephen L. Brown
CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No.: 66468)
Graydon V. Olive, IV (SC Bar No.: 105319)
P.O. Box 993, Charleston, SC 29402
Telephone: (843) 720-5488
Facsimile: (843) 579-1369
Email: sbrown@ycrlaw.com
golive@ycrlaw.com

Attorneys for Appellant City of Folly Beach

Other Counsel of Record:

Ainsley Fisher Tillman (SC Bar No. 70551)
Robert E. Byrd (SC Bar No. 106284)
FORD WALLACE THOMSON LLC
715 King Street
Charleston, South Carolina 29403
Telephone: (843) 277-2011
Email: Ainsley.Tillman@FordWallace.com
Robert.Byrd@FordWallace.com

*Attorneys for Respondents Park Lane
Partners, LLC, and Elizabeth Pratt
Cooper*

RECEIVED

Sep 21 2026

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Thomas J. Rode, Circuit Court Judge

Case No. 2024-CP-10-04208

Park Lane Partners, LLC, and Elizabeth Spratt Cooper, Respondents,

v.

City of Folly Beach, Appellant.

PROOF OF SERVICE

CITY OF FOLLY BEACH

Joseph C. Wilson, IV (SC Bar No.: 63009)

City Attorney

P.O. Box 178

Folly Beach, South Carolina 29439

Telephone: (843) 834-2390

Email: joe@follybeachlaw.com

and

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No.: 66468)

Graydon V. Olive, IV (SC Bar No.: 105319)

P.O. Box 993, Charleston, SC 29402

Telephone: (843) 720-5488

Facsimile: (843) 579-1369

Email: sbrown@ycrlaw.com

golive@ycrlaw.com

Attorneys for Appellant City of Folly Beach

I, Stephen L. Brown, of Clement Rivers, LLP, attorneys for Appellant City of Folly Beach, hereby certify that, on September 21, 2026, Appellant's **AMENDED NOTICE OF APPEAL** was served on Respondents by emailing (see attached email) a copy of the same to counsel of record:

FORD WALLACE THOMSON LLC

Ainsley Fisher Tillman

Ainsley.Tillman@FordWallace.com

Robert E. Byrd

Robert.Byrd@FordWallace.com

Attorneys for Respondents Park Lane Partners, LLC, and Elizabeth Pratt Cooper

Respectfully submitted,

By: s/Stephen L. Brown

CLEMENT RIVERS, LLP

Stephen L. Brown (SC Bar No. 66468)

Attorneys for Appellant City of Folly Beach

Charleston, South Carolina

September 21, 2026

Justman, Aimee

From: Justman, Aimee
Sent: Monday, September 21, 2026 10:40 AM
To: 'robert.byrd@fordwallace.com'; 'Ainsley.Tillman@FordWallace.com';
'rob@rmtlegal.com'; 'Ross@mklawsc.com'; 'liz@mklawsc.com';
'cvarnado@seibelsfirm.com'; 'jwilson@follybeach.gov'
Cc: Brown, Stephen L.; Hines, Russell; Olive, IV, Graydon
Subject: Appeal 2026-001918 - Park Lane v. Folly Beach - CR240808 - Amended Notice of Appeal
Attachments: Amended Notice of Appeal.pdf; Order Granting Motion to Amend.pdf; Order Granting Summary Judgment.pdf; Order Denying Motion to Reconsider.pdf

Attached for service on you in the above-referenced matter, please find an Amended Notice of Appeal and the Orders being appealed.

Thank you,

Aimee Justman
Paralegal and Group Coordinator
Commercial Litigation & Appellate Group
Clement Rivers, LLP
Phone: (843) 720-5460
Fax: (843) 579-1385



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com

RECEIVED

Sep 21 2026

SC Court of Appeals