

October 28, 2026

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S.C. SUPREME COURT

VIA ELECTRONIC MAIL (supctfilings@sccourts.org)

The Honorable Patricia A. Howard
Clerk of Court
Supreme Court of South Carolina
1231 Gervais Street
Columbia, South Carolina 29201

Re: Response to Letter from M. Willoughby (Dated Oct. 27, 2026); *Concerned Citizens of Spartanburg County v. Valara Holdings, LLC et al.*, Petition for Extraordinary Writ in the Original Jurisdiction, Supreme Court Case No. 2026-002350 (Filed October 23, 2026)

Dear Ms. Howard,

On behalf of Petitioner Concerned Citizens of Spartanburg County, we write in response to the letter of Mitchell Willoughby to the Clerk of Court on behalf of Respondent Valara Holdings, LLC, dated October 27, 2026 ("Respondent's Letter"). Respondent's Letter raises legal arguments contending that the Petition for Extraordinary Writ in the above-captioned matter is procedurally improper. Petitioner respectfully submits that letters to the Court are not the appropriate vehicle to brief substantive legal issues, and that Respondent should raise any objections to the Petition in its Return brief, as contemplated by Rule 240, SCACR. Petitioner considers these objections to be without merit, and in response to Respondent's Return brief, Petitioner intends to timely file a Reply addressing these procedural objections.

Sincerely,



Frank Holleman III
Carl T. Brzorad
Catherine M. Wannamaker
Susie Carlson

Attorneys for Petitioner

cc: Mitchell Willoughby, Bruce W. Bannister, Alexander R. Stalvey, Aaron H. Marks, Jeremy A. Fielding, Hunter R. Pope, Andrew J. D'Antoni, and Michael K. Sciacotta (Counsel for Respondent Valara Holdings, LLC)
Stephanie Holmes Burton (Counsel for Respondent Spartanburg County and County Administrator)