RECEIVED

Nov 02 2026

S.C. SUPREME COURT

STATE OF SOUTH CAROLINA COUNTY OF SPARTANBURG	IN THE COURT OF COMMON PLEAS
Concerned Citizens of Spartanburg County, Plaintiff, v. Valara Holdings, LLC, Spartanburg County, and Spartanburg County Administrator, Defendants.	C.A. No. 2026-CP-42-03416 **AFFIDAVIT OF LAURIE OAKMAN IN OPPOSITION TO PLAINTIFF'S MOTIONS FOR SUMMARY JUDGMENT AND PRELIMINARY INJUNCTION**

PERSONALLY APPEARED BEFORE ME, Laurie Oakman, who, being duly sworn, states as follows:

1. I am employed by Spartanburg County as the Deputy Director of Planning and Development.

2. I am familiar with the Spartanburg County Unified Land Management Ordinance ("ULMO"), the County's procedures for reviewing and processing land development applications, and the County's application of the ULMO's Minor and Major Land Development classifications.

3. The ULMO governs, among other matters, applications to develop or alter the use of land within the areas of Spartanburg County subject to the Ordinance. Section 1.02 of the ULMO provides that applications to develop or alter the use of land are classified as either Minor Land Developments or Major Land Developments. Whether an application is submitted as a Major or Minor Land Development, the information required to support the application is generally the same. The only administrative difference is that a Major Land Development application is reviewed by the Planning Commission, while a Minor Land Development application is reviewed by County staff.

ELECTRONICALLY FILED - 2026 Sep 14 5:19 PM - SPARTANBURG - COMMON PLEAS - CASE#2026CP4203416

ELECTRONICALLY FILED - 2026 Sep 14 5:19 PM - SPARTANBURG - COMMON PLEAS - CASE#2026CP4203416

4. Section 1.02 of the ULMO defines a "Major Land Development" as "includes but is not limited to commercial and industrial parks and subdivisions, townhouse developments, shopping centers, manufactured home parks, condominium and apartment complexes, and similar developments."

5. Section 1.02 of the ULMO defines a "Minor Land Development" as "any land development or land altering activity requiring a permit from the County other than a subdivision or Major Land Development."

6. The definitions of Minor Land Development and Major Land Development in Section 1.02 do not classify a project based upon a specified acreage, square footage, construction cost, investment amount, or other monetary threshold.

7. In administering the ULMO, the Spartanburg County Planning and Development Department determines whether an application is processed as a Minor Land Development or Major Land Development based upon the classifications and requirements set forth in the ULMO.

8. The mere fact that a project involves substantial acreage, significant square footage, or a substantial financial investment does not, standing alone, cause an application to be classified as a Major Land Development under the ULMO.

9. Spartanburg County routinely processes Minor Land Development applications involving large or costly commercial projects. The County has previously processed the following projects as Minor Land Developments:

a. BMW Manufacturing Plant (1994), involved approximately 10,000,000 square feet;

b. Amazon – RG Distribution Hwy 221 Distribution Center (2022), involved 1,019,200 square feet;

ELECTRONICALLY FILED - 2026 Sep 14 5:19 PM - SPARTANBURG - COMMON PLEAS - CASE#2026CP4203416

c. Rite Aid Distribution Center (2015), involved 901,350 square feet;

d. Keurig Green Mountain, Inc. (2018), involved 708,040 square feet;

e. Toray Composite Materials America Facility (2015), involved 650,406 square feet;

f. Apollo 17 – Ritrama (2016), involving 367,108 square feet;

g. Upstate Corporate Park (2022), involving 1.2 million square feet; and

h. Greenidge Generation LLC (2023), involving 25,824 square feet data center.

10. These examples reflect the County's ordinary administration of the ULMO and demonstrate that the physical size or financial value of a project does not, by itself, determine whether the project is classified as a Minor or Major Land Development.

11. Consistent with the ULMO and the County's ordinary administrative practices, the County processed Valara Holdings, LLC's application for Phase I of the redevelopment of the former Kohler facility as a Minor Land Development and issued a Minor Land Development Permit for Phase I. Valara Holdings, LLC subsequently submitted a Minor Land Development application for Phase II of the redevelopment, which remains under review.

12. In classifying and considering the Valara Holdings, LLC applications, the County applied the definitions in the ULMO in the same manner as it has historically.

Sworn to before me this 11th day of September 2026.

Laurie Oakman

Laurie Oakman

Notary Public for South Carolina
My Commission Expires: March 18, 2035

DANNIEL MCCRAW
Notary Public - State of South Carolina
My Commission Expires
March 18, 2035