

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Roger M. Young, Circuit Court Judge  
Case No. 2010-CP-08-1771

Appellate Case No. 2014-000183

RECORDED  
JAN 14 2014  
SC Court of Appeals  
73865

North Pleasant, LLC and Vanguard Development Group, LLC .....Appellants,

v.

South Carolina Coastal Conservation League and Edward Dana Beach..... Defendants,

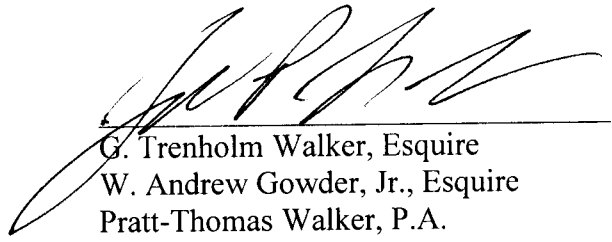
Of whom the South Carolina Coastal Conservation League is the ..... Respondent.

CONSENT MOTION TO CORRECT AND SUPPLEMENT THE RECORD ON APPEAL

Appellants North Pleasant, LLC and Vanguard Development Group, LLC, (“Appellants”) and Respondent South Carolina Coast Conservation League (“Respondent”) hereby move to Correct and Supplement the Record on Appeal. The following documents should be added to the Record on Appeal as an Appendix:

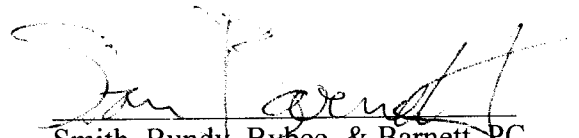
- Plaintiff’s Motion to Alter or Amend, Filed January 2, 2013.
- Trial Transcript, pp. 105, 106, 109, 115, 213, and 256.
- Trial Deposition Designation of R. Pittenger, p. 20

Respectfully submitted,



G. Trenholm Walker, Esquire  
W. Andrew Gowder, Jr., Esquire  
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Post Office Drawer 22247  
Charleston, SC 29413  
843-727-2200  
Attorney for the South Carolina  
Coastal Conservation League and Edward  
Dana Beach

October 14 2014  
Charleston, South Carolina



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Stan Barnett, Esquire  
Ellison D. Smith, IV  
Post Office Box 1542  
Mount Pleasant, SC 29465-1542  
873-881-1623  
Attorneys for Appellants, North  
Pleasant, LLC and Vanguard  
Development, LLC

October 9 2014  
Charleston, South Carolina

IN THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM BERKELEY COUNTY  
COURT OF COMMON PLEAS

Roger M. Young, Circuit Court Judge  
Case No. 2010-CP-08-1771

**RECEIVED**

OCT 16 2014

Appellate Case No. 2014-000183

**SC Court of Appeals**

North Pleasant, LLC and Vanguard Development Group, LLC ..... Appellants,

v.

South Carolina Coastal Conservation League and Edward Dana Beach.....Defendants

Of whom the South Carolina Coastal Conservation League is the.....Respondent.

PROOF OF SERVICE

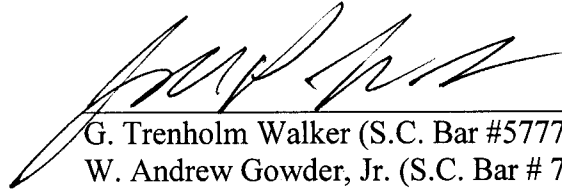
I certify that I served the Appellants North Pleasant, LLC and Vanguard Development Group, LLC with (1) the Consent Motion to Correct and Supplement the Record on Appeal and (2) the Appendix to the Record on Appeal, by depositing a copy of it in the United States Mail; Postage prepaid, to the addresses below, on October 14, 2014.

Stanley Barnett, Esquire  
Smith, Bundy, Bybee & Barnett, PC  
Post Office Box 1542  
Mount Pleasant, SC 29465

Charles R. Reynolds, Esquire  
Santen & Hughes  
600 Vine Street, Suite 2700  
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[Signature on following page]

Respectfully Submitted,  
PRATT-THOMAS WALKER, PA



G. Trenholm Walker (S.C. Bar #5777)  
W. Andrew Gowder, Jr. (S.C. Bar # 7895)  
John P. Linton, Jr. (S.C. Bar #79130)  
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October 14 2014  
Charleston, South Carolina

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DANIEL S. McQUEENEY, JR.  
KATHLEEN FOWLER MONOC  
JOHN P. LINTON, JR.

October 14, 2014

OF COUNSEL  
THOMAS P. GRESSETTE, JR. (SC, USVI)

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(843) 727-2231 (fax)  
jpl@p-tw.com (e-mail)

Via U.S. Mail

The Honorable Jenny Abbot Kitchings  
Clerk of the S.C. Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

**RECEIVED**

OCT 16 2014

**SC Court of Appeals**

Re: *North Pleasant, LLC, et al. v. SCCCL, et al*  
*Appellate Case No.: 2014-000183*

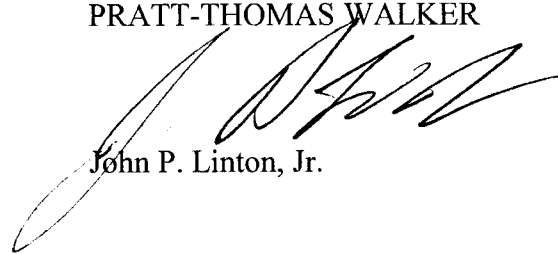
Dear Ms. Kitchings,

Enclosed for filing, please find the parties' Consent Motion to Correct and Supplement the Record on Appeal along with the unbound and fourteen copies of the bound Appendix to the Record on Appeal in the above-referenced matter.

In the event you have any questions, please do not hesitate to contact me.

With kindest regards, I remain

Sincerely,  
PRATT-THOMAS WALKER



John P. Linton, Jr.

JPL/abs  
Enclosures as stated.

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October 14, 2014

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Via U.S. Mail

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED** OF COUNSEL  
THOMAS P. GRESSETT, JR. (SC, US VII)

OCT 16 2014

**SC Court of Appeals**

Re: North Pleasant, LLC and Vanguard Development Group, LLC v. South Carolina Coastal Conservation League and Edward Dana Beach.  
Appellate Case No.: 2014-000183  
File No.:6803.004

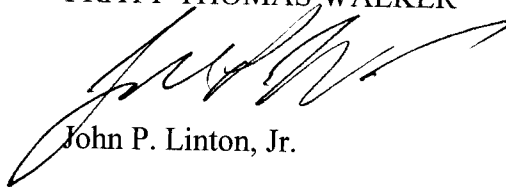
Dear Ms. Kitchings,

Please be advised that this firm represents the Respondent South Carolina Coastal Conservation League in the above referenced appeal. The Final Brief of Respondent is due October 17, 2014. I am writing to request a 20 day extension. By my calculation, the extended deadline would be November 6, 2014.

I have enclosed our firm's check in the amount of \$25.00 to cover the filing fee for this request. By copy of this letter to the opposing counsel, I am advising the Appellants of our request.

Your courtesies and consideration of this matter are greatly appreciated.

Sincerely,  
PRATT-THOMAS WALKER



John P. Linton, Jr.

JPL/abs

cc: Stanley E. Barnett, Esquire  
Elllison D. Smith, Esquire  
Charles E. Reynolds, Esquire