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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Court Judge

**RECEIVED**

JUL 22 2016

SC Court of Appeals

Case No. 2015-CP-10-6186

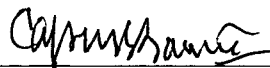
Thomas S. Tisdale, Park R. Dougherty  
and Martha T. Dougherty.....Appellants,

v.

City of Charleston, City of  
Charleston Board of Architectural Review,  
Eugene M. Woodward and  
Janice S. Woodward.....Respondents.

**NOTICE OF APPEAL**

Thomas S. Tisdale, Park R. Dougherty and Martha T. Dougherty appeal the Order of the Honorable J. C. Nicholson, Jr. dated May 4, 2016 and the Order on Plaintiff's Motion to Reconsider dated June 14, 2016. Appellant received written notice of entry of the June 17, 2016 Order on June 23, 2016.



\_\_\_\_\_  
Capers G. Barr, III  
SC Bar No: 00542  
Barr, Unger and McIntosh  
11 Broad Street (29401)  
P.O. Box 1037  
Charleston, SC 29402  
Telephone: 843-577-5083  
Facsimile: 843-723-9039  
[cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)  
Attorney for Appellants

Charleston, South Carolina  
July 20, 2016

Other Counsel of Record:

Timothy A. Domin, Esq.  
Clawson & Staubes, LLC.  
126 Seven Farms Drive, Suite 200  
Charleston, SC 29492

THE STATE OF SOUTH CAROLINA  
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**SC Court of Appeals**

Thomas S. Tisdale, Park R. Dougherty  
and Martha T. Dougherty.....Appellants,

v.

City of Charleston, City of  
Charleston Board of Architectural Review,  
Eugene M. Woodward and  
Janice S. Woodward.....Respondents.

**PROOF OF SERVICE  
OF NOTICE OF APPEAL**

I certify that I have served this Notice of Appeal on Respondents, City of Charleston, City of Charleston Board of Architectural Review, Eugene M. Woodward and Janice S. Woodward by depositing a copy of same in the United States Mail, postage prepaid, on July 20, 2016, addressed to the attorneys of record Timothy A. Domin, Esq., Clawson & Staubes, LLC, 126 Seven Farms Drive, Suite 200, Charleston, SC 29492 and Mr. & Mrs. Eugene M. Woodward, 107 King Street, Charleston, South Carolina, 29401.

BARR, UNGER & McINTOSH



Capers G. Barr, III  
SC Bar No: 00542  
11 Broad Street (29401)

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Telephone: 843-577-5083  
Facsimile: 843-723-9039  
[cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)  
Attorney for Appellants

Charleston, South Carolina  
July 20, 2016

**BARR, UNGER  
& MCINTOSH**  
ATTORNEYS AT LAW

*Capers G. Barr, III*  
Direct Dial: 843-377-1227  
Email: [cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)

July 20, 2016

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
JUL 22 2016  
SC Court of Appeals

Re: Thomas S. Tisdale, et. al. vs. City of Charleston, et. al.  
Case No: 2015-CP-10-6186  
Our File No: 2015-1285

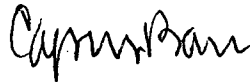
Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the notice of appeal on the respondents;
- (2) A copy of the orders which are to be challenged on appeal; and
- (3) A filing fee of \$100.

I would appreciate receiving back the date stamped copies of the Notice of Appeal and Proof of Service in the self-addressed, stamped envelope.

Sincerely,



Capers G. Barr, III

CGBIII/meg

Enclosures (as stated)

cc: Thomas S. Tisdale, Esq. (by e-mail; w/enclosures)  
Mr. & Mrs. Park R. Dougherty (by e-mail; w/enclosures)  
Timothy A. Domin, Esq. (by e-mail; w/enclosures)  
J. Randolph Pelzer, Esq. (by e-mail; w/enclosures)  
Eugene M. Woodard and Janice S. Woodard (w/enclosures)  
Charleston County Clerk of Court (w/enclosures)

**BARR, UNGER  
& MCINTOSH**  
ATTORNEYS AT LAW

*Capers G. Barr, III*  
Direct Dial: 843-377-1227  
Email: [cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)

July 20, 2016

**RECEIVED**

JUL 22 2016

**SC Court of Appeals**

Ms. Ruth Weese  
1254 Apex Lane  
Charleston, SC 29412

Re: Thomas S. Tisdale, et. al. vs. City of Charleston, et. al.  
Case No: 2015-CP-10-6186  
Our File No: 2015-1285

Dear Ms. Weese:

I represent the Plaintiffs in the above case.

I argued an appeal from a decision of the City of Charleston Board of Zoning Appeals before Honorable J. C. Nicholson, Jr. on March 30, 2016 in the Charleston County Court of Common Pleas.

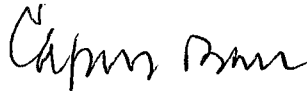
We have filed an appeal to the South Carolina Court of Appeals. This letter is to request that you provide us with a transcript of the hearing, together with your invoice for charges.

I agree to pay per page charge for the transcript as provided by Rule 607, SCACR.

Your kind consideration is greatly appreciated.

With best regards,

Sincerely yours,



Capers G. Barr, III

CGBIII/meg

cc: Thomas S. Tisdale, Esq. (by e-mail)  
Mr. & Mrs. Park R. Dougherty (by e-mail)  
Timothy A. Domin, Esq. (by e-mail)  
J. Randolph Pelzer, Esq. (by e-mail)  
Eugene M. Woodard and Janice S. Woodard  
Clerk of the Appellate Court  
S. C. Office of Court Administration

**BARR, UNGER  
& MCINTOSH**  
ATTORNEYS AT LAW

*Capers G. Barr, III*  
Direct Dial: 843-377-1227  
Email: [cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)

July 20, 2016

Timothy A. Domin, Esq.  
Clawson & Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

**RECEIVED**  
JUL 22 2016  
SC Court of Appeals

Re: Thomas S. Tisdale, et. al. vs. City of Charleston, et. al.  
Case No: 2015-CP-10-6186  
Our File No: 2015-1285

Dear Tim:

Enclosed please find our Notice of Appeal and Proof of Service in the above matter.

With best regards,

Sincerely,



Capers G. Barr, III

GBIII/meg

Enclosures (as stated)

cc: Thomas S. Tisdale, Esq. (by e-mail; w/enclosures)  
Mr. & Mrs. Park R. Dougherty (by e-mail; w/enclosures)  
Timothy A. Domin, Esq. (by e-mail; w/enclosures)  
J. Randolph Pelzer, Esq. (by e-mail; w/enclosures)  
Eugene M. Woodard and Janice S. Woodard (w/enclosures)  
Clerk of the Appellate Court (w/enclosures)

**BARR, UNGER  
& MCINTOSH**<sub>5F</sub>  
ATTORNEYS AT LAW

*Capers G. Barr, III*  
Direct Dial: 843-377-1227  
Email: [cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)

July 20, 2016

Mr. & Mrs. Eugene M. Woodard  
107 King Street  
Charleston, South Carolina 29401

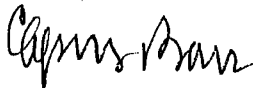
Re: Thomas S. Tisdale, et. al. vs. City of Charleston, et. al.  
Case No: 2015-CP-10-6186  
Our File No: 2015-1285

Dear Mr. & Mrs. Woodard:

Enclosed please find our Notice of Appeal and Proof of Service in the above matter.

With best regards,

Sincerely,



Capers G. Barr, III

GBIII/meg

Enclosures (as stated)

cc: Thomas S. Tisdale, Esq. (by e-mail; w/enclosures)  
Mr. & Mrs. Park R. Dougherty (by e-mail; w/enclosures)  
Timothy A. Domin, Esq. (by e-mail; w/enclosures)  
J. Randolph Pelzer, Esq. (by e-mail; w/enclosures)  
Clerk of the Appellate Court (w/enclosures)

**BARR, UNGER  
& MCINTOSH**  
ATTORNEYS AT LAW

*Capers G. Barr, III*  
Direct Dial: 843-377-1227  
Email: [cgb@barrungermcintosh.com](mailto:cgb@barrungermcintosh.com)

July 20, 2016

Honorable Julie J. Armstrong  
Charleston County Clerk of Court  
100 Broad Street  
Charleston, SC 29401

Re: Thomas S. Tisdale, et. al. vs. City of Charleston, et. al.  
Case No: 2015-CP-10-6186  
Our File No: 2015-1285

Dear Ms. Armstrong:

Please find enclosed an original and one (1) copy of Appellant's Notice of Appeal and Certificate of Service in the above matter which was filed with the South Carolina Court of Appeals today.

I would appreciate your filing the original and returning the clocked copy in the enclosed envelope.

Thank you for your assistance in this matter.

With best regards,

Sincerely,



Capers G. Barr, III

GBIII/meg

Enclosures (as stated)

cc: Thomas S. Tisdale, Esq. (w/enclosures)  
Mr. & Mrs. Park R. Dougherty (w/enclosures)  
Timothy A. Domin, Esq. (w/enclosures)  
J. Randolph Pelzer, Esq. (w/enclosures)  
Eugene M. Woodard and Janice S. Woodard (w/enclosures)

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )  
 )  
Thomas S. Tisdale, Park R. Dougherty and )  
Martha T. Dougherty, )  
 )  
Petitioners, )  
 )  
vs. )  
 )  
The City of Charleston, City of Charleston )  
Board of Architectural Review, Eugene M. )  
Woodard and Janis S. Woodard, )  
 )  
 )  
Respondents. )  
 )  
\_\_\_\_\_ )


IN THE COURT OF COMMON PLEAS

Case No: 2015-CP-10-6186

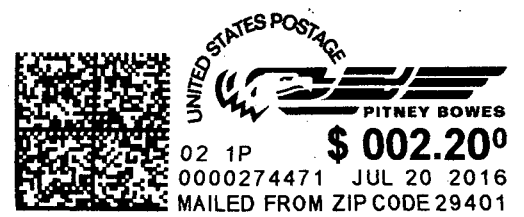
CERTIFICATE OF SERVICE

I hereby certify that I have served Appellant's Notice of Appeal on the Attorneys for Respondents by placing a copy of same in the United States mail this 20<sup>th</sup> day of July, 2016 with sufficient postage attached thereto and addressed as follows:

Timothy A. Domin, Esq.  
Clawson & Staubes, LLC  
126 Seven Farms Drive, Suite 200  
Charleston, SC 29492

  
Megan E. Gardner  
Paralegal to Capers G. Barr, III

Charleston, South Carolina  
July 20, 2016



BARR, UNGER AND MCINTOSH, L.L.C.  
 ATTORNEYS AT LAW  
 11 BROAD STREET  
 P. O. BOX 1037  
 CHARLESTON, SOUTH CAROLINA 29402-1037

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To:  
 The Honorable Jenny Abbott Kitchings  
 Clerk of Court  
 SC Court of Appeals  
 1220 Senate Street  
 Columbia, South Carolina 29201

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