

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Appellate Case No. 2015-002297

**RECEIVED**  
FEB 09 2017  
SC Court of Appeals

John Doe, .....Appellant,

v.

Board of Zoning Appeals (BZA) and Town of Sullivan's Island (S.I.),  
S.I. Zoning Administrator, and S.I. Building Dept., Individually and in  
Official Capacity, ..... Respondents.

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**RETURN TO APPELLANT'S PETITION FOR REHEARING**

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G. Trenholm Walker (SC Bar # 5777)  
John P. Linton, Jr. (SC Bar # 79130)  
Walker Gressette Freeman & Linton, LLC  
P.O. Drawer 22167  
Charleston, SC 29413-2216  
(843) 727-2200  
Attorneys for Respondents

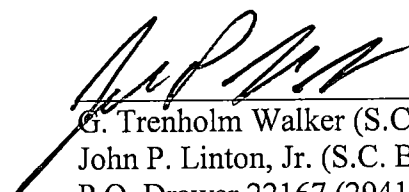
February 6, 2017

Charleston, South Carolina

On January 31, 2017, Respondents received an undated<sup>1</sup> Petition for Rehearing of the Court's Order dated December 1, 2016, which denied Appellant's Petition for Rehearing of the Court's Order dated November 4, 2016. Because neither of these orders had the effect of dismissing or finally deciding the appeal, the Court should deny the latest Petition for Rehearing pursuant to 240(i) SCACR.

Respectfully Submitted,

WALKER GRESSETTE FREEMAN & LINTON, LLC



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G. Trenholm Walker (S.C. Bar #5777)  
John P. Linton, Jr. (S.C. Bar #79130)  
P.O. Drawer 22167 (29413-2216)  
Charleston, SC 29403  
Phone: (843) 727-2200  
Email: [walker@wgflaw.com](mailto:walker@wgflaw.com)  
[linton@wgflaw.com](mailto:linton@wgflaw.com)

February 6, 2017

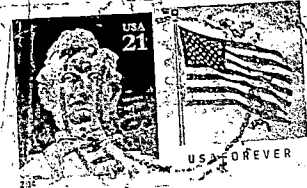
Charleston, South Carolina

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<sup>1</sup> Respondents did not receive a copy of a proof of service of the Petition for Rehearing. However, enclosed was a copy of two envelopes appearing to be addressed to the former office street address (16 Charlotte Street, Charleston, SC 29403) for counsel for Respondents. See Ex. A. The envelopes also appear to have been returned to sender on January 6, 2017. Counsel for Respondents provided notice of change in firm affiliation and mailing address to the Court and Cynthia Holmes, Esq. via letter dated December 21, 2016. See Ex. B.

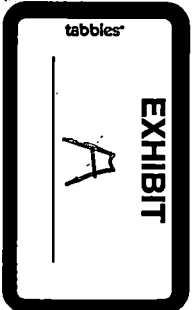
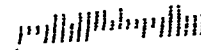
29482-0187

306 Station 22½  
Sullivan's Island, South Carolina 29482-9788



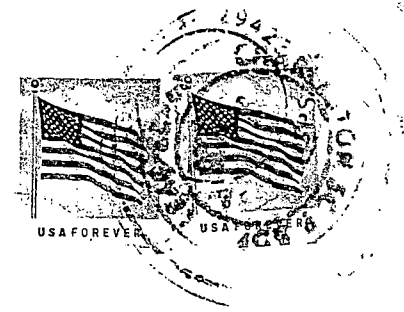
GT Walker  
c/o PTH  
16 Charletta St.  
Charleston, SC 29403

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RETURN TO SENDER  
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UNABLE TO FORWARD  
RETURN TO SENDER



29482-0187

306 Station 22½  
Sullivan's Island, South Carolina 29482-9788

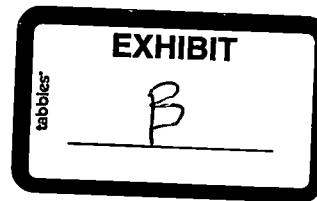


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01/06/17



WALKER  
GRESSETTE  
FREEMAN  
LINTON LLC



G. Irenholm Walker  
Thomas P. Gressette, Jr.  
Ian W. Freemon  
John P. Linton, Jr.

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SC Court of Appeals

JOHN P. LINTON, JR.  
Direct: 843.727.2252  
Email: Linton@WGFLAW.com

December 21, 2016

The Honorable Jenny Abbott Kitchings  
South Carolina Clerk, Court of Appeals  
John C. Calhoun Building  
1220 Senate Street  
Columbia, SC 29201

Re: Thomas S. Tisdale, et al. v. City of Charleston, et al.  
SC Court of Appeals Case No. 2016-001530

John Doe v. Board of Zoning Appeals, et al.  
SC Court of Appeals Case No. 2015-002297

Boehm v. Town of Sullivan's Island, et al.  
SC Court of Appeals Case No. 2015-001230

Dear Ms. Kitchings:

I am counsel of record in the cases listed above. I write to update the Court regarding my recent change in firm affiliation. If you would, please update the records of the Court to show the following"

John P. Linton, Jr.  
Walker Gressette Freeman & Linton, LLC  
PO Box 22167  
Charleston, SC 29413  
Direct: 843-727-2208  
Facsimile: 843-727-2238  
Email: [Linton@WGFLAW.com](mailto:Linton@WGFLAW.com)

By copy of this correspondence to all other counsel in these matters, I am informing them of the same.

Sincerely,

A handwritten signature in black ink, appearing to read "John P. Linton, Jr.", written over a horizontal line.

John P. Linton, Jr.

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c: Capers G. Barr, III, Esq. (Email)  
Timothy A. Domin, Esq. (Email)  
Cynthia Holmes, Esq. (U.S. Mail)  
Alice F. Paylor, Esq. (Email)

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2015-002297

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**SC Court of Appeals**

John Doe, .....Appellant,

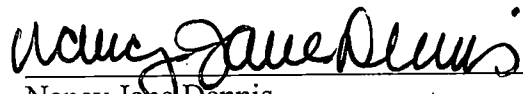
v.

Board of Zoning Appeals (BZA) and Town of Sullivan's Island (S.I.), S.I.  
Zoning Administrator, and S.I. Building Dept., Individually and in  
Official Capacity, ..... Respondents.

**PROOF OF SERVICE**

I certify that I served Respondents' Return to Appellant's Petition for Rehearing  
via United States Mail, First Class, prepaid, to the Appellant at the address below on  
February 6, 2017:

John Doe  
C. Holmes  
P.O. Box 187  
Sullivan's Island, SC 29482-0187

  
Nancy Jane Dennis  
Paralegal

February 6, 2017

U.S.MAIL  EMAIL

The Honorable Jenny Abbott Kitchings  
Clerk of Court, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**

FEB 09 2017

**SC Court of Appeals**

Re: John Doe, Appellant, v. Board of Zoning Appeals (BZA) and Town of Sullivan's Island (S.I.), S.I. Zoning Administrator, and S.I. Building Dept., Individually and in Official Capacity, Respondents  
Appellate Case No. 2015-002297

Dear Ms. Kitchings:

Enclosed please find the original and six copies of the Respondents' Return to Appellant's Petition for Rehearing with Proof of Service.

Thank you for your courtesies in filing this with the Court.

Sincerely,

WALKER GRESSETTE FREEMAN & LINTON, LLC

  
Nancy Jane Dennis  
Paralegal

Enclosures

c: John Doe (w/encl.)  
C. Holmes  
P.O. Box 187  
2061 Middle Street  
Sullivan's Island, SC 29482

**Walker Gressette Freeman & Linton LLC**  
PO Box 22167  
Charleston, SC 29413



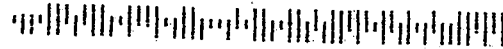
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**\$ 002.41<sup>0</sup>**

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FEB 06 2017

MAILED FROM ZIP CODE 29403



**RECEIVED**

FEB 09 2017

**SC Court of Appeals**

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