

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge
S. Jackson Kimball, Special Circuit Court Judge

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NOV 13 2017
SC Court of Appeals

Case No. 2015-CP-46-002460

Morningstar Fellowship Church

Appellant/Respondent

v.

York County, South Carolina

Respondent/Appellant

**NOTICE OF APPEARANCE OF DONALD M. BROWN, JR. ON BEHALF OF
APPELLANT/RESPONDENT, MORNINGSTAR FELLOWSHIP CHURCH**

TO THE HONORABLE COURT OF APPEALS OF SOUTH CAROLINA: The undersigned counsel, Donald M. Brown, Jr., of the law firm of Brown & Associates, PLLC, hereby provides notice to the Court and all parties and their counsel that he will appear for all purposes herein on behalf of Appellant/Respondent, Morningstar Fellowship Church. Please direct copies of all future correspondence, pleadings, notices, and other contacts regarding the case to Donald M. Brown, Jr. at Brown & Associates, PLLC at the addresses listed below.

This the 9th day of November, 2017.



Donald M. Brown, Jr.
S.C. Bar No. 9902
brownandassociatespllc@gmail.com
BROWN & ASSOCIATES, PLLC
Park South Professional Center
10440 Park Road, Suite 200
Charlotte, NC 28210
Telephone: (704) 542-2525
Facsimile: (704) 541-4751
Appellant/Respondent

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PROOF OF SERVICE

I certify that I have served the Notice of Appearance on Respondent/Appellant, York County, South Carolina, by depositing a copy of it in the United States Mail, postage prepaid, on November 9, 2017 addressed to the attorneys of record as follows:

W. Keith Martens
HAMILTON MARTENS, LLC
P.O. Box 10940
Rock Hill, SC 29730
803-329-7672

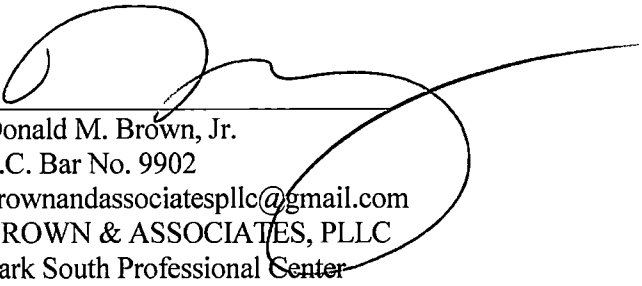
Daniel J. Ballou
Morton & Gettys, LLC
Fountain Park Place
331 E. Main St., Suite 300
P.O. Box 707
Rock Hill, SC 29731

Michael K. Kendree
YORK COUNTY ATTORNEY
P.O. Box 229
York, SC 29745

**A courtesy copy has been sent to previous
counsel for Appellant/Respondent
Morningstar Fellowship Church:**

Richard B. Fennell
S.C. Bar No. 10467
James, McElroy & Diehl, P.A.
600 S. College Street
Charlotte, NC 28202
(704) 372-9870

This the 9th day of November, 2017.



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Appellant/Respondent

**BROWN & ASSOCIATES, PLLC
ATTORNEYS AND COUNSELORS AT LAW**

Park South Professional Center
10440 Park Road, Suite 200
Charlotte, North Carolina 28210

+LICENSED IN NORTH CAROLINA
AND SOUTH CAROLINA

TELEPHONE: (704) 542-2525
FACSIMILE: (704) 541-4751

Thursday, November 9, 2017

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SC Court of Appeals

VIA US MAIL

Jenny Abbott Kitchings, Clerk of Court
V. Claire Allen, Deputy Clerk
The South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

Re: Case: 2015-002460 - Morningstar Fellowship Church, Appellant/Respondent, v. York
County, South Carolina, Respondent/Appellant - FILING REQUEST AND RESPONSE TO
CLERK'S LETTER DATED NOVEMBER 8, 2017

Dear Ms. Kitchings and Ms. Allen:

I hope this letter finds you well.

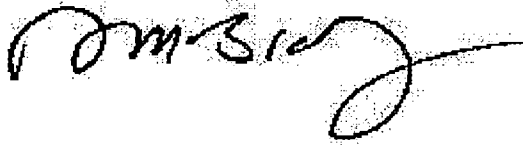
I have been asked to handle oral arguments on behalf of Morningstar before the South Carolina
Court of Appeals in the above-referenced matter.

This letter requests the filing of an original and 3 copies of the enclosed Notice of Appearance
and Proof of Service. Additionally, a return self-addressed and stamped envelope is enclosed for
return of the filed documents to our office.

Additionally, we are in receipt of your letter dated November 8, 2018 where you inform the
parties that the case may or may not be considered during March 2018. At this time, I do have a
potential conflict on the calendar for March 5, 6, 13, 14, and 15 as I am scheduled to be in a 2-3
week trial in March on a case pending before the United States District Court for the Western
District of North Carolina. The trial is currently set for March 5-23, 2018.

As always, we appreciate your kind assistance in this matter.

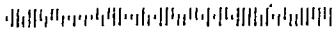
Kindest regards,

A handwritten signature in black ink, appearing to read "Don Brown". The signature is stylized with a large, sweeping initial "D" and a long, horizontal flourish extending to the right.

Don Brown
Attorney for Morningstar Fellowship Church, Appellant/Respondent

Cc:
W. Keith Martens
Daniel J. Ballou
Michael K. Kendree
Richard B. Fennell

Brown & A
10440 Parl
Suite 200
Charlotte, NC 28210-8403



Jenny Abbott Kitchings, Clerk of Court
W. Claire Allen, Deputy Clerk
The South Carolina Court of Appeals
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