

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

\_\_\_\_\_  
Carmen T. Mullen, Circuit Court Judge  
Case No. 2013-CP-07-01341  
\_\_\_\_\_

\_\_\_\_\_  
Appeal Case No. 2017-001736  
\_\_\_\_\_

**RECEIVED**

DEC 14 2017

SC Court of Appeals

Road, LLC and Pinkney Point, LLC,..... Appellants,

v.

Beaufort County, a political subdivision of the  
State of South Carolina, .....Respondent.

\_\_\_\_\_  
**CONSENT MOTION TO AMEND CAPTION**  
\_\_\_\_\_

The Notice of Appeal in this case was incorrectly and mistakenly captioned as both Plaintiffs, Pinckney Point, LLC and Road, LLC, appealing the circuit court’s order dated July 18, 2017. Plaintiff Road, LLC is the only Appellant. To correct the caption<sup>1</sup>, Appellant, Road, LLC, with the consent of counsel for the Respondent, hereby requests that the caption be amended as follows:

Road, LLC and Pinckney Point, LLC, Plaintiffs,  
Of Whom Road, LLC is the Appellant,

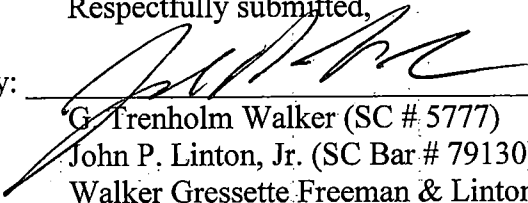
v.

Beaufort County, a political subdivision of the State of South Carolina, Respondent.

\_\_\_\_\_  
<sup>1</sup> The non-appealing Plaintiff, Pinckney Point, LLC was inadvertently misspelled in the original caption and that scrivener’s error is also corrected by this consent motion.

Respectfully submitted,

By:

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

December 12, 2017  
Charleston, South Carolina

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

\_\_\_\_\_  
Carmen T. Mullen, Circuit Court Judge  
Case No. 2013-CP-07-01341

\_\_\_\_\_  
Appeal Case No. 2017-001736  
\_\_\_\_\_

**RECEIVED**

DEC 14 2017

SC Court of Appeals

Road, LLC and Pinckney Point, LLC  
of whom Road, LLC is the ..... Appellant,

v.

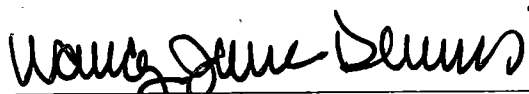
Beaufort County, a political subdivision of the State of South  
Carolina, ..... Respondent.

\_\_\_\_\_  
**PROOF OF SERVICE**  
\_\_\_\_\_

I certify that I have served the **APPELLANT'S CONSENT MOTION TO AMEND CAPTION**, on Respondent by depositing a copy of it in the United States Mail, postage prepaid, on December 12, 2017, addressed to its attorneys of record as follows:

C. Mitchell Brown  
Nelson Mullins Riley & Scarborough, LLP  
P.O. Box 11070  
Columbia, SC 29211

Robert W. Achurch, III  
Mary Bass Lohr  
Howell Gibson & Hughes, P.A.  
P.O. Box 40  
Beaufort, SC, 29901

  
\_\_\_\_\_  
Nancy Jane Dennis, Paralegal



G. Trenholm Walker  
Thomas P. Gressette, Jr.  
Ian W. Freeman  
John P. Linton, Jr.  
Charles P. Summerall, IV

JOHN P. LINTON, JR.  
Direct: 843.727.2252  
Email: [Linton@WGFLAW.com](mailto:Linton@WGFLAW.com)

December 12, 2017

U.S. MAIL  FEDERAL EXPRESS  EMAIL

Hon. Jenny Abbott Kitchings  
Clerk of Court for S.C. Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**  
DEC 14 2017  
SC Court of Appeals

Re: Road, LLC, et al. v. Beaufort County, et al.  
Appellate Case No. 2017-001736  
WGFL File 7087.001

Dear Ms. Kitchings:

Enclosed for filing with the Court please find Appellant's Consent Motion to Amend Caption with Proof of Service and \$25 filing fee.

Thank you very much for your courtesies in this matter

Sincerely,

WALKER GRESSETTE FREEMAN & LINTON, LLC



John P. Linton, Jr.

Enclosures (As Stated)

c: C. Mitchell Brown, Esq.  
Robert W. Achurch, Esq.  
Mary B. Lohr, Esq.

**WALKER  
GRESSETTE  
FREEMAN  
LINTON LLC**

66 Hasell Street, Charleston, SC 29401  
PO Box 22167, Charleston, SC 29413



**RECEIVED**  
DEC 14 2017  
SC Court of Appeals

Hon. Jenny Abbott Kitchings  
Clerk of Court for S.C. Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

