

IN THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No. 2017-002095

**RECEIVED**  
MAR 13 2018  
SC Court of Appeals

Elizabeth Earley, John Earley, Lloyd Wilkins,  
Henry Kerns, Margie Mills Kerns, Donna Pearson,  
and Bruce Pearson,

Appellants,

v.

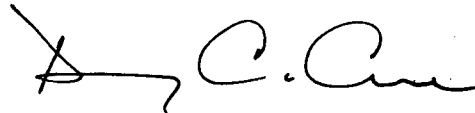
The City of Woodruff, SC, and the Terraces at  
Woodruff, a South Carolina Limited Liability Company,

Respondents.

PROOF OF SERVICE

I certify that I have served the Final Brief of Respondents on all parties by causing a copy of it to be deposited in the United States Mail, postage prepaid, on March 13, 2018, addressed to all counsel of record, Nathan A. Earle, Esquire, 1541 Wade Hampton Boulevard, Suite E, Greenville, South Carolina 29609, and Michael A. Graham, Esquire, P.O. Box 433, Columbia, South Carolina 29202.

March 13, 2018

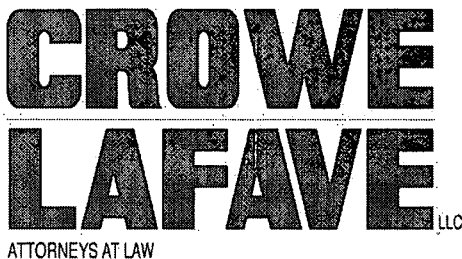


Danny C. Crowe  
Crowe LaFave, LLC  
P.O. Box 1149  
500 Taylor Street, Suite 401  
Columbia, South Carolina 29202  
803-724-5728

Attorney for Respondent  
City of Woodruff

Danny C. Crowe Esq.  
[danny@crowclafave.com](mailto:danny@crowclafave.com)  
Direct: 803.724.5728; Fax: 803.724.5730

Matthew C. LaFave, Esq.  
[matt@crowclafave.com](mailto:matt@crowclafave.com)  
Direct: 803.724.5727; Fax: 803.724.5726



Mary D. LaFave, Esq.  
[mary@crowclafave.com](mailto:mary@crowclafave.com)  
Direct: 803.726.6756; Fax: 803.726.3621

Robert D. Garfield, Esq.  
[robert@crowclafave.com](mailto:robert@crowclafave.com)  
Direct: 803.999.1225; Fax: 803.848.8157

March 13, 2018

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SC Court of Appeals

*Via Hand Delivery*

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

RE: Elizabeth Earley, John Earley, Lloyd Wilkins, Henry Kerns, Marie Mills Kerns,  
Donna Pearson, and Bruce Pearson v. The City of Woodruff, SC, and the  
Terraces at Woodruff, a South Carolina Limited Liability Company  
Case No. 2016-CP-42-03288

Dear Ms. Kitchings:

Please find attached for filing an original and 20 copies of the Final Brief of Respondents in the above-captioned matter. Also enclosed for filing is an original and three copies of the Proof of Service. Once filing is complete, please return the clocked copies to the individual presenting this Final Brief for filing.

By copy of this correspondence to the attorneys of record, I am hereby serving upon them a copy of the Final Brief of Respondents. Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read "D C Crowe".

Danny C. Crowe

DCC/dmb  
Enclosures

cc: Nathan A. Earle, Esquire  
Terry F. Clark, Esquire  
Michael A. Graham, Esquire