

**STATE OF SOUTH CAROLINA  
In the Supreme Court**

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**APPEAL FROM HORRY COUNTY  
Court of Common Pleas**

**RECEIVED**

Deadra Jefferson, Circuit Court Judge

APR 03 2018

S.C. SUPREME COURT

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**APPELLATE CASE NO. 2015-002533**

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**Jacklyn J. Donevant . . . . . Respondent**

**v.**

**Town of Surfside Beach. . . . . Petitioner**

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**PETITIONER'S REPLY TO RESPONDENT'S RETURN TO THE  
PETITION FOR REHEARING**

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Charles F. Thompson, Jr.  
Malone, Thompson, Summers & Ott  
339 Heyward Street  
Columbia, S.C. 29201  
803-254-3300

Attorney for Appellant

Other counsel of record:

Henrietta Golding, Esquire  
McNair Law Firm  
2411 N. Oak Street, Suite 206  
Myrtle Beach S.C. 29577  
843-444-1107

Attorney for the Respondent

**REPLY TO THE RESPONSE TO THE PETITION FOR REHEARING AND  
RECONSIDERATION**

In reply to the Respondents Return to the Petition for Rehearing, the Town of Surfside points out the following significant omissions:

1. Donevant cited no evidence refuting Surfside's showing that this case rests on the allegation Donevant was terminated for the specific act of issuing a stop-work order. The case has never been framed, nor was it tried, as a case in which she was precluded from enforcing the building code at all.
2. Donevant brought forward no evidence refuting Surfside's counsel's showing that he never conceded that the case was broader than the stop-work order issue. Although Donvant points the court to the recording of the court of appeals argument at time 8:39, she did not quote any words and a review of the recording reveals nothing more than the limited concession which was specifically quoted by Surfside's counsel in Surfside's Petition for Rehearing.



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April 3, 2018

STATE OF SOUTH CAROLINA  
In the Supreme Court

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Deadra Jefferson, Circuit Court Judge

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APPELLATE CASE NO. 2015-002533

TRIAL CASE NO. 2012-CP-26-4852

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Jacklyn J. Donevant . . . . . Respondent

v.

Town of Surfside Beach. . . . . Petitioner

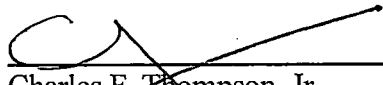
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**PROOF OF SERVICE**

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The foregoing Petitioner's Motion to Extend time for filing a Reply to the Response to the Petition for Rehearing was served on Respondent, via first class mail, postage prepaid and addressed to Plaintiff's counsel of record:

Henrietta Golding, Esquire  
McNair Law Firm  
2411 N. Oak Street, Suite 206  
Myrtle Beach S.C. 29577

  
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