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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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SC Court of Appeals

Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2017-000170

Citizens for Quality Rural Living, Inc.

Appellant,

v.

Greenville County Planning Commission, and RMDC, Inc.

Respondents.

BRIEF OF APPELLANT

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STATEMENT OF ISSUES ON APPEAL

1. Did the circuit court err in failing to find that the Appellant has standing under S. C. Code § 6-29-1150(D)(1)?

2. Did the circuit court err in failing to find that the Appellant has standing under Greenville County Land Development Regulations Article 1, Section 1.5?

3. Did the circuit court err in failing to find that the Appellant has standing under the public interest or public importance standard or the Declaratory Judgment Act to set forth a uniform standard for the application of the comprehensive land use plan in Planning Commission decisions affecting unzoned areas of the county (approximately 2/3rds of the land mass of Greenville County) and traffic standards?

STATEMENT OF THE CASE

On August 24, 2016, the Greenville County Planning Commission ("Commission") approved the preliminary subdivision plan of RMDC, Inc. (RMDC) to develop "Copperleaf Subdivision." The Commission had thrice previously denied the subdivision, specifically on November 18, 2015, March 23, 2016, and May 25, 2016. (R. p. 10, paragraphs 8 & 9; R. p. 31, paragraphs 6 &7)

Citizens for Quality Rural Living, Inc. (Appellant) appealed the Commission's decision to the circuit court on September 19, 2016. (R. p. 7) Respondent RMDC filed a Motion to Dismiss on October 18, 2016, which the Commission supported. (R. p. 37 and R. p. 52) Arguments were heard by the circuit court on November 1, 2016, and on December 8, 2016, the circuit court issued its order dismissing the matter "due to Appellant's lack of standing in this matter." (R. p. 1)

Appellant filed a Motion to Alter or Amend Judgment and/or Motion for Reconsideration on December 16, 2016, specifically raising five questions, and the circuit court denied the motion by form order filed December 30, 2016. (R. p. 55 and R. p. 4)

On January 20, 2017, Appellant served the Notice of Appeal on the Commission and RMDC.

FACTS

Appellant, Citizens for Quality Rural Living, Inc., is a not for profit community entity incorporated in South Carolina whose members are residents of the County of Greenville owning property in the vicinity of the subdivision approved and are impacted by the decision of the Greenville County Planning Commission; some of whom are owners of farms or property in the immediate vicinity of the subdivision proposed in this matter, namely South Shirley Road, Woodside Road and McKelvey Road. (R. p. 9 and R. p. 63, lines 11-15)

Respondent Greenville County Planning Commission ("Commission") is an appointed local planning commission as defined in S.C. Code Ann. § 6-29-310 (2004), et. seq., known as the South Carolina Local Government Comprehensive Planning Enabling Act of 1994.

Respondent RMDC, Inc., is, upon information and belief, a Florida corporation registered in South Carolina as a foreign corporation, and is named on the proposed subdivision plat as the Developer, and is a necessary party to this action. (*Spanish Wells Property Owners Ass'n, Inc., v. Board of Adjustment of Town of Hilton Head Island,* 295 S.C. 67, 68, 367 S.E.2d 160, 161 (1988) ("[W]e adopt the majority rule and hold that a development permittee is a necessary party to an appeal of its permit.") (See R. pp. 48 - 51.)

RMDC applied for preliminary approval of its plan to develop "Copperleaf Subdivision," a high density subdivision in a rural section of the County of Greenville

adjoining Woodside Road, South Shirley Road and McKelvey Road. (See R. pp. 48 - 51.)

This subdivision has come before the Planning Commission four times, specifically on November 18, 2015, March 23, 2016, May 25, 2016, and most recently on August 24, 2016. In each instance, the Developer/Applicant is listed as RMDC Inc, P. O. Box 15887, Tallahassee, FL 32317. The property owner, also a Florida entity upon information and belief, is never listed as a party to the subdivision application before the Greenville County Planning Commission and has not registered as a foreign corporation to do business in South Carolina. (Se R. pp. 48 - 51.)

Numerous members of the community, many of whom are members of Citizens for Quality Rural Living, opposed the proposed subdivision at each meeting in which it was considered, and stood in opposition to the subdivision for reasons including largely inconsistency with the Greenville County Comprehensive Plan; incompatibility with the surrounding community; public health and safety due to the roads in the area; and environmental concerns.

ARGUMENTS

I. THE APPELLANT HAS STANDING UNDER S.C. CODE SECTION 6-29-1150(D)(1).

The South Carolina Local Government Comprehensive Planning Enabling Act of 1994, Codified in Title 6, Chapter 29, allows local governments to create planning commissions (S.C. Code Ann. § 6-29-320 (2004)) and governs the appeal process from those bodies. As all counsel in this appeal agree, the statutory language governs who may appeal. (Rule 74, SCRCP, "Except for the time for filing the notice of appeal, the procedure on appeal to the circuit court from the judgment of an inferior court or decision of an administrative agency or tribunal shall be in accordance with the statutes providing such appeals.") (R. p. 40; R. p. 52; R. p. 63, line 24-p. 64 line 4; R. p. 69, lines 12-22; R. p. 72, line 24 – p. 74, line 14)

a. The plain language of the statute governing appeals from the Planning commission gives the Appellant standing.

Appeals from the Planning Commission are governed by S.C. Code Ann. § 6-29-1150 (Supp. 2016), the relevant portion of which reads as follows:

> (D)(1) An appeal from the decision of the planning commission must be taken to the circuit court within thirty days after actual notice of the decision.
>
> (2) A property owner whose land is the subject of a decision of the planning commission may appeal by filing a notice of appeal with the circuit court accompanied by a request for pre-litigation mediation in accordance with Section 6-29-1155.

> A notice of appeal and request for pre-litigation mediation must be filed within thirty days after the decision of the board is mailed.

The language of subsection (D)(1) allowing an appeal was previously a part of subsection (C) of Section 6-29-1150 under the 1994 enactment; but a 2003 amendment moved this language to subsection (D)(1), added the right for mediation for the property owner whose land is subject to the planning commission's decision in subsection (D)(2), and added various procedures in subsections (D)(3) through (4). The only substantive change in the language of subsection (D)(1) governing an appeal generally was the change of the word "may" (original language) to "must," indicating that this is the only route of appeal. (Subsections (D)(3) & (D)(4) deal with such matters as docket numbers, filing fees, and jury trials.)

The 2003 amendment added rights specific to "[a] property owner whose land is the subject of a decision" to pursue pre-litigation mediation as part of the appeal, but this language does not change or limit those who may appeal generally. ("A property owner whose land is the subject of a decision of the planning commission may appeal by filing a notice of appeal with the circuit court accompanied by a request for pre-litigation mediation in accordance with Section 6-29-1155." *Id.*) Based on this language, no other party has the right to demand mediation, but this language does not limit who can appeal under subsection (D)(1) without demanding mediation. In addition, the 2003 amendments specifically provide for non-property owners to be involved: "A person who is not the owner of the property may petition to intervene as a party [in the mediation

process], and this motion must be granted if the person has a substantial interest in the decision of the planning commission." S.C. Code Ann. § 6-29-1155(A) (Supp. 2016).

It is axiomatic that a statute must be construed to give meaning and purpose to all words within it. "'A statute should be so construed that no word, clause, sentence, provision or part shall be rendered surplusage, or superfluous....' 82 C.J.S. Statues § 346." *Matter of Decker,* 322 S.C. 215, 218, 471 S.E.2d 462, 463 (1995). In order to give effect to all parts of the statute, subsection (D)(1) must include more than just the property owner as a potential appellant; (D)(2) allows an appeal by property owners and reiterates the thirty-day time limit for appeal, making (D)(1) largely superfluous if limited to property owners. Statutory construction requires that the Court "presume the legislature did not intend a futile act, but rather intended its statutes to accomplish something." *TNS Mills, Inc. v. S.C. Dept. of Revenue, 331 S.C. 611, 620, 503 S.E.2d 471, 476 (1998), citing State ex rel. McLeod v. Montgomery, 244 S.C. 308, 136 S.E.2d 778 (1964).* Thus, this Court must give some meaning to the open language of subsection (D)(1) beyond the more restrictive meaning ascribed by Respondents by reference to subsection (D)(2).

The interpretation of Richland County is consistent with the interpretation argued herein. Richland County provides a very clear interpretation of the appeal provisions in S.C. Code Ann. § 6-29-1150(D) (Supp. 2016) in its regulations regarding minor subdivisions which recognizes appeal by non-parties as well as additional options for the property owners:

> Pursuant to the requirements of Section 6-29-1150 (c) [sic] of the South Carolina Code of Laws, any person who has a substantial interest in the decision may

> appeal such decision of the Richland County Planning Commission to the Circuit Court, provided that a proper petition is filed with Richland County Clerk of Court within thirty (30) days after the applicant receives written notice of the decision. . . . In the alternative, also within thirty (30) days, a property owner whose land is the subject of a decision by the Planning Commission may appeal by filing a notice of appeal with the Circuit Court accompanied by a request for pre-litigation mediation in accordance with Section 6-29-1150 and Section 6-29-1155 of the South Carolina Code of Laws.

Land Development Code of Richland County, South Carolina, Sec. 26-54(c)(2)(g)(2). *See also* Sec.26-53(b)(1)(g), Sec. 26-53(b)(2)(g), and Sec. 26-53(b)(3)(f)(2) (Current through 3-15-2016) (although the regulation cites to the statute subsection (c) rather than (D), it clearly intends subsection (D) since the provisions under the original (c) did not allow for mediation, and Section 1155 which it references was added in 2003.)

On its face, the plain language of the statute allowing appeal gives standing to the Appellant.

b. Consideration of the statutory scheme as a whole demands the conclusion that Appellant has standing.

Interpretation of any statute requires consideration of the larger statutory scheme. "In construing statutory language, the statute must be read as a whole, and sections which are part of the same general statutory law must be construed together and each one given effect." *TNS Mills, citing Higgins v. State, 307 S.C. 446, 415 S.E.2d 799 (1992).* Thus, particularly since section 1155 was enacted simultaneously with subsections (D)(2)-(4) and the amendment of the language of subsection (D)(1), the language of section 1155 should be considered along with the appeals provisions of section 1150. Section 1155 expressly provides for parties other than the property owner to be involved in the settling of disagreements with the planning commission: "A person who is not the owner of the

property may petition to intervene as a party [in the mediation process], and this motion must be granted if the person has a substantial interest in the decision of the planning commission." S.C. Code Ann. § 6-29-1155(A) (Supp. 2016). The legislature could have reworded section 1150 to expressly exclude all other parties from the right to appeal except the property owner if the legislature had intended that result. Thus, the legislature clearly contemplated parties other than simply the property owner being involved.

c. Construing the statute to limit appeals to the property owner would result in absurdity, since the property owner is not a necessary party to the permit process.

If the language of the statute is plain, then the Courts must apply the plain meaning unless such interpretation would lead to an absurd result. A statute should be construed by the Court to avoid the absurdity. *Clemson University v. Speth*, 344 S.C. 310, 313, 543 S.E.2d 572 (Ct. App. 2001); *Moon v. City of Greer*, 348 S.C. 184, 190, 558 S.E.2d 527 (Ct. App. 2002). Opposing counsel's interpretation of the statute that only the property owner may appeal does result in an absurdity or irrationality. The permittee in the current matter is a developer and not the property owner. The property owner is not named as part of the application process at all. (See R. pp. 48-51.) The property owner may be a partner with the developer, may hope to sell to the developer, may be doing business under the name of the developer, or have other interests, but has not been part of this application process, is not named in, and is not required to be named in or privy to, any public documents filed with the Planning Commission. If an appeal is limited to the property owner, the permittee whose permit was denied, who initiated the process, and who presumably has the financial interest at stake would have no standing to appeal and

no right to intervene in an appeal unless the property owner appealed and chose the route of pre-litigation mediation. The plain language of the statute does not lend itself to this limiting interpretation.

d. Comparison of parallel statutory schemes compels a broader interpretation of "party" than just a property owner.

A parallel statutory scheme, also under the Comprehensive Planning Enabling Act, may be found is S.C. Code Ann. § 6-29-820 (Supp. 2016) regarding appeals from the zoning board (as opposed to the planning commission). The statutory scheme there has undergone parallel changes. The original § 6-29-820 under the 1994 Act read as follows:

> Section 6-29-820. A person who may have a substantial interest in any decision of the board of appeals or an officer or agent of the appropriate governing authority may appeal from a decision of the board to the circuit court in and for the county by filing with the clerk of the court a petition in writing setting forth plainly, fully, and distinctly why the decision is contrary to law. The appeal must be filed within thirty days after the decision of the board is mailed.

(Compare the original § 6-29-1150(C) appeal provision: "An appeal from the decision of the planning commission may be taken to circuit court within thirty days after actual notice of the decision." South Carolina Local Government Comprehensive Planning Enabling Act of 1994, Act 355, 1994 Acts). Amendments in 2003 changed the section to read in a similar form to the section at issue, as follows:

> **SECTION 6-29-820.** Appeal from zoning board of appeals to circuit court; pre-litigation mediation; filing requirements.
>
> (A) A person who may have a substantial interest in any decision of the board of appeals or an officer or agent of the appropriate governing authority may appeal from a decision of the board to the circuit court in and for the county, by filing with the clerk of the court a petition in writing setting forth plainly, fully, and

> distinctly why the decision is contrary to law. The appeal must be filed within thirty days after the decision of the board is mailed.
>
> (B) A property owner whose land is the subject of a decision of the board of appeals may appeal either:
> (1) as provided in subsection (A); or
> (2) by filing a notice of appeal with the circuit court accompanied by a request for pre-litigation mediation in accordance with Section 6-29-825.
>
> Any notice of appeal and request for pre-litigation mediation must be filed within thirty days after the decision of the board is postmarked.

The legislature went on to provide similar mediation guidelines in a new subsection (S.C. Code Ann. § 6-29-825) (Supp. 2016) similar to the provisions in Section 6-29-1155. At least two cases have been filed with this Court under this statutory language, and neither challenged the appeal on the basis that the appellants were not property owners. This Court has noted that under this scheme, non-property owner appellants who challenged whether the decision was correct as a matter of law had standing, even though their positions had not been presented at the public hearing or communicated to the Board prior to filing the appeal petition with the circuit court merely by filing their issues on appeal in a written petition before the thirty-day filing period had expired. *Newton v. Zoning Bd. of Appeals for Beaufort Cnty., 396 S.C. 112, 719 S.E.2d 282 (Ct. App. 2011), reh'g denied; Bevivino v. Town of Mount Pleasant Bd. of Zoning Appeals, 402 S.C. 57, 737 S.E.2d 863 (Ct. App. 2013).*

The Municipal Association of South Carolina has published a guide for its constituents on the application of the Comprehensive Land Development Enabling Act. The MASC guide describes the parallel provisions of the enabling statute governing administrative appeals, boards of zoning appeals and the planning commissions, and how

the 2003 amendments provided additional remedies for a property owner, but did not ameliorate any rights of non-property owners to appeal decisions impacting their communities. Municipal Association of South Carolina, *2014 Comprehensive Planning Guide for Local Governments*, see particularly pp. 48-49, 56-57, 70, http://www.masc.sc/SiteCollectionDocuments/Land%20Use%20Planning/Comp%20Planning%20Guide.pdf#search=publications. Consistent interpretation of the statutory language would require the interpretation that non-property owners are granted the right to appeal under S.C. Code Ann. § 6-29-1150 (Supp. 2016).

II. THE APPELLANT HAS STANDING UNDER GREENVILLE COUNTY LAND DEVELOPMENT REGULATIONS ARTICLE 1, SECTION 1.5.

Appellant has standing under the plain language of the county regulations. Greenville County Land Development Regulations, 2004 Edition, which were in effect at the time of the permit decision and the appeal, provided as follows in "ARTICLE I GENERAL PROVISIONS":

> 1.5 Appeals
>
> ....
>
> An appeal from the decision of the Planning Commission may be made pursuant to the provisions of Title 6, Chapter 29. [sic] taken to Circuit Court within thirty (30) days after actual notice of the decision.
>
> Any person aggrieved by a decision of the Commission rendered after hearing may within thirty (30) days after notice thereof file an appeal in circuit court for a review of the decision of the Commissioners pursuant to Section 6-29-1150 of the South Carolina Local Government Comprehensive Planning Enabling Act of 1994.

The plain language of the county regulation allows for an appeal by "any person aggrieved." The Appellant has demonstrated an interest in both the technical legal aspects (whether the decision was made contrary to law) and the impact on adjoining landowners and the community at large, thus clearly falling within the purview of "any person aggrieved."

In a similar situation under the prior statutory scheme, this Court found that a community group, Spanish Wells Property Owners Association, had standing to appeal a planning commission's grant of a development permit under the "any person who may have a substantial interest" standard in the old S.C. Code § 6-7-750: "Spanish Wells and its members, as the owners of property adjacent to and in the near vicinity of the Calibogue development, are persons with a substantial interest in the Board's decision. The statute, therefore, gives Spanish Wells standing to appeal." *Spanish Wells Property Owner's Ass'n, Inc., v. Board of Adjustment of Town of Hilton Head Island*, 292 S.C. 542, 357 S.E.2d 487 (Ct. App. 1987), (overruled on other grounds, *Spanish Wells Property Owners Ass'n, Inc. v. Board of Adjustment of Town of Hilton Head Island*, 295 S.C. 67, 367 S.E.2d 160 (1988)). *See also Bevivino,* 402 S.C. 57, 737 S.E.2d 863, 867 (finding standing under the S.C. Code Ann. § 6-29-820 (Supp. 2016) language "'any person who may have a substantial interest' in the zoning board decision" in individuals who lived in proximity to the approved project to appeal a Board of Zoning Appeals decision even when they had never attended a Board hearing.) The regulation granting the right to appeal in the case before the court does not even specify a "substantial interest," yet Citizens for Quality Rural Living members include both contiguous and

nearby property owners and residents who do have substantial interests in the decision of the Planning Commission.

The Commission argued before the circuit court that the language of the county ordinance providing an appeal mechanism for "any person aggrieved" in effect at the time of the permit approval and appeal is in contradiction to the governing state statutes amended in 2003, and as such must be ignored in favor of the very strict reading by the Commission's counsel that would allow only a property owner to appeal. (R. p. 70, lines 12-20) Counsel argued that this result is demanded by the 2003 amendments. However, other counties have interpreted that same statutory section in their Land Development Regulations much more broadly and not restricted to property owners.

Horry County revised its Land Development Regulations in 2008, well after the 2003 state statute amendments, and provides for appeals by "any party aggrieved." ("Any party aggrieved by a decision of the Planning Commission regarding the standards enumerated in these regulations or a ruling on a requested variance may appeal the decision to the Circuit Court of Horry County." Land Development Regulations of Horry County, South Carolina, Article 1, Section 11.)

Richland County's regulations indicate they are current through March 15, 2016, again, after the most recent statute statutory updates that Greenville County alleges prohibit appeals by anyone other than the property owner. Richland County acknowledges appeals by both non-property owners and property owners. Land Development Code of Richland County, *supra.* p. 7-8.

Colleton County provides for an appeal by "any party aggrieved by a decision of the planning commission …." Colleton County Code, Section 14.04-2.060(B) (Version Jun 21, 2016) (section adopted 9-7-2010).

Charleston County regulations provide as follows with regard to subdivision-related decisions:

> Any person with a substantial interest in a decision of the Planning Commission or any officer, board or bureau of the County may appeal a final decision of the Planning Commission to the Circuit County of Charleston County. Appellants shall file with the Court Clerk a written petition plainly and fully setting forth how such decision is contrary to law.

Zoning and Land Development Regulations of Charleston County, section 3.14.9 (Adopted 1999, but amended as recently as November 1, 2016.)

The plain language of the county regulation allows for appeal by appellant, and should be followed.

Preposterously, counsel for the Commission argued that the question of standing in this matter should be governed by a regulatory amendment that was pending at the time of the appeals hearing and would not have even had its first reading, much less been adopted, at the time the permit was issued and the appeal filed. The regulation itself states that it will "take effect on the date of adoption." Greenville County, South Carolina Land Development Regulations 2016 Edition, Section 1.6.6.

Even if the lower court considered the proposed regulation amendment, the language does not change the outcome. Counsel for the Commission stated that "the 'any person aggrieved' language has been replaced." (R. p. 53) In fact, the language was not

replaced, but omitted. The entirety of the Appeals section of the regulation at the time the permit was granted was as follows:

> **1.5 Appeals**
> Any authorized action or decision made by the Planning Department staff may be appealed to the Planning Commission within fifteen (15) days. Any appeals will be scheduled for the next available Planning Commission meeting for consideration.
>
> An appeal from the decision of the Planning Commission may be made pursuant to the provisions of Title 6, Chapter 29. [sic] taken to Circuit Court within thirty (30) days after actual notice of the decision.
>
> Any person aggrieved by a decision of the Commission rendered after hearing may within thirty (30) days after notice thereof file an appeal in circuit court for a review of the decision of the Commissioners pursuant to Section 6-29-1150 of the South Carolina Local Government Comprehensive Planning Enabling Act of 1994.

Supra.

The entire Appeals section after the 2016 amendment provides as follows:

> **1.6.2 Appeals**
> Any authorized action or decision made by the Community Planning, Development and Public Works Department staff may be appealed to the Planning Commission within fifteen (15) days. Any appeals will be scheduled for the next available Planning Commission meeting for consideration.
>
> An appeal from the decision of the Planning Commission must be made within thirty (30) days after actual notice of the decision pursuant to the provisions of Title 6, Chapter 29 of the Code of Laws of South Carolina, as amended.

Greenville County, South Carolina Land Development Regulations 2016 Edition.

Although the amendment omits the "any person aggrieved" language, it does not replace it with "property owner" or any other limitation on who can appeal. Both the original and the new language refer to the authorizing statute and defer to it for rules governing an appeal.

Furthermore, there is no indication of intent by the County to change the appeals procedure such that the alteration might affect the interpretation. See *Moon,* 348 S.C. 184, 189, fn. 10, citing 82 C.J.S. *Statutes* § 273 (1999) ("In the revision or codification of statutes, a mere change in phraseology or punctuation, or the addition or omission of words, is not regarded as changing the operation, effect, or meaning of the statutes, unless the intent to change is clear and unmistakable."). Contrary to the Commission's argument, the attempt, if any may be read into it, is to bring the regulation further in line with the state statute by referring exclusively to the statute for all rules governing appeal, which puts us squarely under the state statute argued above.

The plain language of the county regulation allows for this appeal.

III. THE APPELLANT HAS STANDING UNDER THE PUBLIC INTEREST OR PUBLIC IMPORTANCE STANDARD OR THE DECLARATORY JUDGMENT ACT TO SET FORTH A UNIFORM STANDARD FOR THE APPLICATION OF THE COMPREHENSIVE LAND USE PLAN IN PLANNING COMMISSION DECISIONS AFFECTING UNZONED AREAS OF THE COUNTY (APPROXIMATELY 2/3RDS OF THE LAND MASS OF GREENVILLE COUNTY) AND TRAFFIC STANDARDS.

Additionally, Appellant would have standing under the public interest or public importance standard or the Declaratory Judgment Act to set forth a uniform standard for the application of the Comprehensive Land Use Plan in Planning Commission decisions affecting unzoned areas of the county (approximately 2/3rds of the land mass of Greenville County) and traffic standards. *See S.C. Pub. Interest Found. v. S.C.*

Transportation Infrastructure Bank, 403 S.C. 640, 744 S.E.2d 521 (2013) ("The public importance exception grants standing to a party who has not suffered a particularized injury where the issue involved is of such public importance that its resolution is required for future guidance." *Citing ATC South, Inc., v. Charleston Cnty.*, 380 S.C. 191, 198, 699 S.E.2d 337, 341 (2008).) *See also Joseph v. S.C. Dept. of Labor, Licensing & Regulation*, 417 S.C. 436, 450, 790 S.E.2d 763 (2016) ("[T]he Declaratory Judgment Act … affords a party the right to question the construction or validity of a statute or legal instrument that allegedly affects a right, status or legal relationship.")

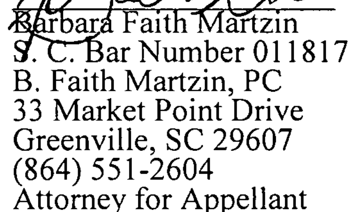
In addition, the various counties throughout South Carolina have differing interpretations of the state statute regarding rights on appeal, as noted above, that beg for a uniform understanding and application of the statute. "The key to the public importance analysis is whether a resolution is needed for future guidance." *ATC South, Inc.*

CONCLUSION

The Appellant has standing to appeal the Planning Commission decision approving the subdivision "Copperleaf" under the governing state statutes, under the county regulations, and under the Declaratory Judgments Act. For the reasons stated, this Court should reverse the judgment of the circuit court.

March 23, 2017

Respectfully submitted,



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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Letitia H. Verdin, Circuit Court Judge

Appellate Case No. 2017-000170

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SC Court of Appeals

Citizens for Quality Rural Living, Inc.

Appellant,

v.

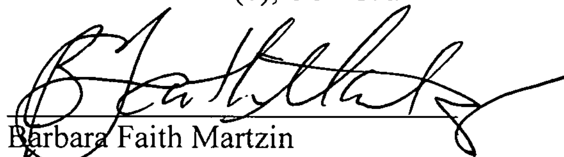
Greenville County Planning Commission, and RMDC, Inc.

Respondents.

CERTIFICATE OF COUNSEL

The undersigned certifies that this Final Brief complies with Rule 211(b), SCACR.

May 22, 2017



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