

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Jennifer B. McCoy, Circuit Court Judge

**RECEIVED**  
JAN 28 2019  
SC Court of Appeals

Case No. 2018-CP-10-3307

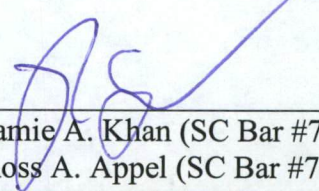
The Charleston County School District.....Appellant,

v.

Charleston County, South Carolina; The Charleston County Board of Zoning Appeals; and Joel Evans in his capacity as Director of the Charleston County Zoning and Planning Department.....Respondents.

NOTICE OF APPEAL

Appellant, the Charleston County School District "Appellant" appeals the orders of the Honorable Jennifer B. McCoy, filed on December 28, 2018 and January 9, 2019. On December 31, 2018, Appellant received written notice of entry of the Final Order and Decision filed on December 28, 2018. On January 4, 2019, Appellant timely served and filed a motion to reconsider, alter, or amend such order. On January 10, 2019 Appellant received written notice of an entry of an order filed on January 9, 2019 which denied Appellant's motion to alter, amend or reconsider.

  
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Jamie A. Khan (SC Bar #76685)  
Ross A. Appel (SC Bar #79149)  
**McCULLOUGH KHAN, LLC**  
359 King Street, Suite 200  
Charleston, SC 29401  
(843) 937-0400  
(843) 937-0706 (fax)  
[ross@mklawsc.com](mailto:ross@mklawsc.com)

**ATTORNEYS FOR APPELLANT**

1/24, 2019

Counsel of Record:

Bernard W. Ferrara, Jr., Esq.  
Lonnie Hamilton, III Public Service Building  
4045 Bridge View Drive  
North Charleston, SC 29405  
[BFerrara@charlestoncounty.org](mailto:BFerrara@charlestoncounty.org)

Attorney for Respondents Charleston County, South Carolina; the Charleston County Board of Zoning Appeals; and Joel Evans in his capacity as Director of the Charleston County Zoning and Planning Department

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PROOF OF SERVICE

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I certify that I have served the Notice of Appeal on Respondents Charleston County, South Carolina; The Charleston County Board of Zoning Appeals; and Joel Evans in his capacity as Director of the Charleston County Zoning and Planning Department, by depositing a copy of it in the United States Mail, postage prepaid, on January 24, 2019, addressed to the attorney of record, Bernard W. Ferrara, Jr., Esq., 4045 Bridge View Drive, North Charleston, South Carolina 29405.

  
\_\_\_\_\_  
Jamie A. Khan (SC Bar #76685)  
Ross A. Appel (SC Bar #79149)  
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**ATTORNEYS FOR APPELLANT**

1/24, 2019



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January 24, 2019

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals Clerk  
Post Office Box 11629  
Columbia, SC 29211

**Re: The Charleston County School District v. Charleston County, South Carolina;  
the Charleston County Board of Zoning Appeals; and Joel Evans in his  
capacity as Director of the Charleston County Zoning and Planning  
Department**  
Case No.: 2018-CP-10-3307

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JAN 28 2019

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed for filing, please find the following: the original and one (1) copy of Appellant Charleston County School District's notice of appeal, the original and one (1) copy of the proof of service on counsel for the Respondents, the corresponding Orders being challenged on appeal and our firm's check in the amount of \$250.00 to cover the associated filing fee.

Please file the original documents and return the clocked copies to our office in the enclosed, self-addressed, stamped envelope. Also, please note that the notice of appeal is also being filed with the Charleston County Clerk of Court's office today.

Thanks in advance for your assistance with this matter and please do not hesitate to contact me if you have any questions or need anything further. With kind regards, I remain

Sincerely yours,

McCULLOUGH KHAN, LLC

Ross A. Appel

RAA:kbn

Enclosures

cc: Bernard W. Ferrara, Jr., Esq.  
The Honorable Julie J. Armstrong, Charleston County Clerk of Court

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JAN 24 2019

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JAN 28 2019  
SC Court of Appeals



359 King Street, Suite 200 • Charleston, SC 29401

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals Clerk  
Post Office Box 11629  
Columbia, SC 29211

