

STATE OF SOUTH CAROLINA

IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

MARIN H. DUKES, III, CIRCUIT COURT JUDGE

CASE NUMBER 2018-CP-07-00784

RECEIVED

MAR 05 2019

SC Court of Appeals

BRADLEY CIRCLE VACATION PROPERTIES, LLC, and
MONTI DEVELOPMENT HH, LLC,

APPELLANTS,

vs.

THE TOWN OF HILTON HEAD ISLAND, THE TOWN OF HILTON HEAD
ISLAND BOARD OF ZONING APPEALS, TAMARA BECKER and
RHONDA CARPER,

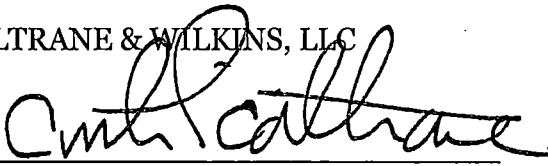
RESPONDENTS.

NOTICE OF MOTION AND MOTION TO
SUBSTITUTE COUNSEL

Curtis L. Coltrane moves the Court for an Order substituting Curtis L. Coltrane as counsel for the Town of Hilton Head Island, South Carolina, and reliving Gregroy M. Alford as counsel for the Town of Hilton Head Island, South Carolina, in this case. All other counsel consent to the Motion.

Respectfully Submitted:

COLTRANE & WILKINS, LLC

By: 

Curtis L. Coltrane
South Carolina Bar Number: 1344
Post Office Box 6808
Hilton Head Island, SC 29938
(843) 785-5551
(843) 785-5552
curtis@coltraneandwilkins.com

Hilton Head Island, South Carolina

This 28th day of February, 2019.

From: [Barry Johnson](#)
To: [Curtis Coltrane](#); [Drew A. Laughlin](#); [Gregory M. Alford](#)
Cc: [Gay Reed](#)
Subject: RE: Bradley Circle Vacation Properties, et al. v. Town, et al.
Date: Tuesday, February 26, 2019 5:05:04 PM

I consent. Please add my e-signature.



BARRY L. JOHNSON
Attorney at Law
barry@JD-PA.com

The Victoria Building, Suite 200 | 10 Pinckney Colony Road | Bluffton, SC 29909
843-815-7121 Main | 843-815-7122 Fax | Visit: <http://www.jdwpa.com>

This message is from the law firm of Johnson & Davis, PA and may be a confidential and privileged legal communication to the named recipient(s). If you receive this message in error or are not the named recipient(s), please notify the sender and delete this e-mail. Thank you.

From: Curtis Coltrane [<mailto:curtis@coltraneandwilkins.com>]
Sent: Tuesday, February 26, 2019 4:24 PM
To: [Drew A. Laughlin](#); [Barry Johnson](#); [Gregory M. Alford](#)
Subject: Bradley Circle Vacation Properties, et al. v. Town, et al.

Drew, Barry and Greg:

Attached is a motion to substitute counsel in the Court of Appeals. If you consent to the motion, please reply by email with your consent, and I will attach that to the motion.

Thank you. I am,

Sincerely

Curtis L. Coltrane
COLTRANE & WILKINS, LLC

Mailing Address:
Post Office Box 6808
Hilton Head Island, SC 29938

Street Address:
2 Park Lane, Suite 200
Hilton Head Island, SC 29928

(843) 785-5551
(843) 785-5552 (Facsimile)
curtis@coltraneandwilkins.com

CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any US Federal Tax advice contained in this communication

(including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (I) avoiding penalties under the internal revenue code or (II) promoting, marketing or recommending to another party any transaction or matter addressed herein. This advice may not be forwarded (other than within the taxpayer to which it has been sent) without our express written consent.

PRIVILEGE AND CONFIDENTIALITY NOTICE: This communication (including any attachments) is being sent by or on behalf of a lawyer or law firm and may contain confidential or legally privileged information. The sender does not intend to waive any privilege, including the attorney-client privilege, that may attach to this communication. If you are not the intended recipient, you are not authorized to intercept, read, print, retain, copy, forward or disseminate this communication. If you have received this communication in error, please notify the sender immediately by email and delete this communication and all copies.

From: Gregg Alford
To: Curtis Coltrane
Subject: Re: FW: Bradley Circle Vacation Properties, et al. v. Town, et al.
Date: Wednesday, February 27, 2019 5:40:32 PM

I consent.

Gregg Alford

On Wed, Feb 27, 2019 at 5:34 PM Curtis Coltrane <curtis@coltraneandwilkins.com> wrote:

Greg:

See below. I don't have a response on this one.

Thank you. I am,

Sincerely

Curtis L. Coltrane

COLTRANE & WILKINS, LLC

Mailing Address:

Post Office Box 6808

Hilton Head Island, SC 29938

Street Address:

2 Park Lane, Suite 200

Hilton Head Island, SC 29928

(843) 785-5551

(843) 785-5552 (Facsimile)

curtis@coltraneandwilkins.com

CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any US Federal Tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (I) avoiding penalties under the internal revenue code or (II) promoting, marketing or recommending to another party any transaction or matter addressed herein. This advice may not be forwarded (other than within the taxpayer to which it has been

sent) without our express written consent.

PRIVILEGE AND CONFIDENTIALITY NOTICE: This communication (including any

attachments) is being sent by or on behalf of a lawyer or law firm and may contain confidential or legally privileged information. The sender does not intend to waive any privilege, including the attorney-client privilege, that may attach to this communication. If you are not the intended recipient, you are not authorized to intercept, read, print, retain, copy, forward or disseminate this communication. If you have received this communication in error, please notify the sender immediately by email and delete this communication and all copies.

From: Curtis Coltrane <curtis@coltraneandwilkins.com>

Sent: Tuesday, February 26, 2019 4:24 PM

To: Drew A. Laughlin (drew.laughlin@laughlinandbowen.com)

<drew.laughlin@laughlinandbowen.com>; Barry L. Johnson (barry@jd-pa.com)

<barry@jd-pa.com>; Gregory M. Alford (gregg@alfordlawsc.com)

<gregg@alfordlawsc.com>

Subject: Bradley Circle Vacation Properties, et al. v. Town, et al.

Drew, Barry and Greg:

Attached is a motion to substitute counsel in the Court of Appeals. If you consent to the

motion, please reply by email with your consent, and I will attach that to the motion.

Thank you. I am,

Sincerely

Curtis L. Coltrane

COLTRANE & WILKINS, LLC

Mailing Address:

Post Office Box 6808

Hilton Head Island, SC 29938

Street Address:

2 Park Lane, Suite 200

Hilton Head Island, SC 29928

(843) 785-5551

(843) 785-5552 (Facsimile)

curtis@coltraneandwilkins.com

CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any US Federal Tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (I) avoiding penalties under the internal revenue code or (II) promoting, marketing or recommending to another party any transaction or matter addressed herein. This advice may not be forwarded (other than within the taxpayer to which it has been

sent) without our express written consent.

PRIVILEGE AND CONFIDENTIALITY NOTICE: This communication (including any

attachments) is being sent by or on behalf of a lawyer or law firm and may contain confidential or legally privileged information. The sender does not intend to waive any privilege, including the attorney-client privilege, that may attach to this communication. If you are not the intended recipient, you are not authorized to intercept, read, print, retain, copy, forward or disseminate this communication. If you have received this communication in error, please notify the sender immediately by email and delete this communication and all copies.

--

Gregory M. Alford
Alford Law Firm, LLC
P.O. Drawer 8008
Hilton Head, SC 29938
(843) 842-5500
(843) 842-8400 fax

CONFIDENTIALITY NOTE: THE INFORMATION CONTAINED IN THIS ELECTRONIC MAIL TRANSMISSION IS LEGALLY PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING THIS ELECTRONIC MAIL MESSAGE IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS ELECTRONIC MAIL IN ERROR, PLEASE ACCEPT OUR APOLOGIES AND IMMEDIATELY DELETE IT, AS WELL AS NOTIFYING US OF THE ERROR BY REPLYING TO THIS ELECTRONIC MAIL OR CALL US AT 843-842-5500.

From: [Drew Laughlin](#)
To: [Curtis Coltrane](#)
Cc: [Barry L. Johnson](#); [Gregory M. Alford](#)
Subject: Re: Bradley Circle Vacation Properties, et al. v. Town, et al.
Date: Tuesday, February 26, 2019 6:18:49 PM

I consent

Sent from my iPad

On Feb 26, 2019, at 4:24 PM, Curtis Coltrane <curtis@coltraneandwilkins.com> wrote:

Drew, Barry and Greg:

Attached is a motion to substitute counsel in the Court of Appeals. If you consent to the motion, please reply by email with your consent, and I will attach that to the motion.

Thank you. I am,

Sincerely

Curtis L. Coltrane
COLTRANE & WILKINS, LLC

Mailing Address:
Post Office Box 6808
Hilton Head Island, SC 29938

Street Address:
2 Park Lane, Suite 200
Hilton Head Island, SC 29928

(843) 785-5551
(843) 785-5552 (Facsimile)
curtis@coltraneandwilkins.com

CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, we inform you that any US Federal Tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (I) avoiding penalties under the internal revenue code or (II) promoting, marketing or recommending to another party any transaction or matter addressed herein. This advice may not be forwarded (other than within the taxpayer to which it has been sent) without our express written consent.

PRIVILEGE AND CONFIDENTIALITY NOTICE: This communication (including any attachments) is being sent by or on behalf of a lawyer or law firm and may contain confidential or legally privileged information. The sender does not intend to waive any privilege, including the attorney-client privilege, that may

attach to this communication. If you are not the intended recipient, you are not authorized to intercept, read, print, retain, copy, forward or disseminate this communication. If you have received this communication in error, please notify the sender immediately by email and delete this communication and all copies.

<2019 02 26 Motion To Substitute Counsel.pdf>

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM BEAUFORT COUNTY
COURT OF COMMON PLEAS

MARIN H. DUKES, III, CIRCUIT COURT JUDGE

CASE NUMBER 2018-CP-07-00784

RECEIVED
MAR 05 2019
SC Court of Appeals

BRADLEY CIRCLE VACATION PROPERTIES, LLC, and
MONTI DEVELOPMENT HH, LLC,

APPELLANTS,

vs.

THE TOWN OF HILTON HEAD ISLAND, THE TOWN OF HILTON HEAD
ISLAND BOARD OF ZONING APPEALS, TAMARA BECKER and
RHONDA CARPER,

RESPONDENTS.

CERTIFICATE OF MAILING


I, Audrey S. Wanich, paralegal at Coltrane & Wilkins, LLC, certify that, on this date, I caused to be served one copy of the Rule 209 Certification by depositing a copy of the same in the United States Mail, with proper first-class postage affixed thereon, addressed as follows:

Gregory M. Alford, Esq.
Post Office Drawer 8008
Hilton Head, SC 29938

Drew A. Laughlin, Esq.
Post Office Drawer 21119
Hilton Head, SC 29925

Barry L. Jonshon, Esq.
The Victoria Building, Suite 200
10 Pinckney Colony Rd.
Bluffton, SC 29910

COLTRANE & WILKINS, LLC

By 
Audrey S. Wanich, Paralegal
Post Office Box 6808
Hilton Head Island, SC 29938
(843) 785-5551

Hilton Head Island, South Carolina

This 28th Day of February, 2019.

COLTRANE & WILKINS, LLC
ATTORNEYS AT LAW

POST OFFICE DRAWER 6808
HILTON HEAD ISLAND, SC 29938
(843) 785-5551
(843) 785-5552 (FAX)

Curtis L. Coltrane
E-Mail: curtis@coltraneandwilkins.com
Certified Circuit Court Mediator
Certified Circuit Court Arbitrator
Certified Federal Court Mediator

Curtis L. Coltrane*
John W. Wilkins
*Also Member Virginia Bar

February 28, 2019

RECEIVED

MAR 05 2019

SC Court of Appeals

Hon. Jenni A. Kitchings
Clerk of the South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

RE: Bradley Circle Vacation Properties, LLC, et. al. v. Town of Hilton
Head Island, et. al.
Case No: 2018-CP-07-784

Dear Ms. Kitchings:

The above-referenced appeal was filed in your court within the last 10 days or so. Enclosed, you will find a copy of a Motion to Substitute Counsel, seeking to substitute me as counsel for the Town of Hilton Head Island, and the Town Hilton Head Island Board of Zoning Appeals in place of Gregory M. Alford, who is shown as counsel on the Notice of Appeal. Attached to the motion, you will find copies of the consent of Barry L. Johnson, Drew A. Laughlin, and Gregory M. Alford, who are all of the counsel in the above-referenced case. Finally, you will find a check in the amount of \$25.00 for the filing fee for this motion.

Please let me know if anything further is needed in connection with this matter. I am,

Sincerely,

COLTRANE & WILKINS, LLC



Curtis L. Coltrane

CLC/asw

cc: Drew A. Laughlin, Esq.
Barry L. Johnson, Esq.
Gregory M. Alford, Esq.

COLTRANE & WILKINS, LLC

Attorneys at Law

TWO PARK LANE, SUITE 200

POST OFFICE BOX 6808

HILTON HEAD ISLAND, SOUTH CAROLINA 29938

NEOPOST

FIRST-CLASS MAIL

02/28/2019

US POSTAGE \$000.80⁰⁰



ZIP 29928
041L10421715

Hon. Jenni A. Kitchings

Clerk of the South Carolina Court of Appeals

PO Box 11629

Columbia, SC 29211

RECEIVED

MAR 05 2019

SC Court of Appeals