

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

JUN 10 2019

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
The Honorable Marvin H. Dukes, III

Civil Action No.: 2012-CP-07-01394
Appellate Case No.: 2016-000687

GRAYS HILL BAPTIST CHURCH.....Respondent

-vs-

BEAUFORT COUNTY, AND THE BEAUFORT COUNTY ZONING BOARD OF
APPEALS, DEFENDANTS

AND

THE UNITED STATES OF AMERICA, DEFENDANT – INTERVENOR

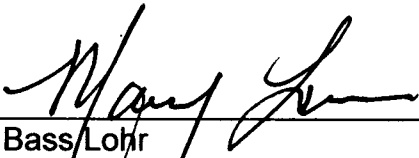
OF WHICH BEAUFORT COUNTY AND THE UNITED STATES OF AMERICA
ARE THE.....Appellants

RESPONSE TO PETITION FOR REHEARING

Grays Hill Baptist Church has filed a petition for rehearing in this matter. Beaufort County believes no argument in response to the grounds for the Church's petition is required inasmuch as the Church's Petition is a verbatim duplicate of its initial brief. The Church has made no effort to elucidate the Court on points it may have overlooked or misapprehended, but rather has copied its original brief, to which the County has previously replied and the Court has held oral argument and ruled upon those issues. To the extent the Court finds it

requires response to these issues, the County has responded to these arguments in its Reply Brief, to which it craves reference.

HOWELL, GIBSON & HUGHES, P.A.

By: 
Mary Bass Lohr
Post Office Box 40
Beaufort, SC 29901-0040
(843) 522-2400
Attorney for Appellant Beaufort County
Bar No: 16927

Beaufort, South Carolina

June 6, 2019

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PROOF OF SERVICE

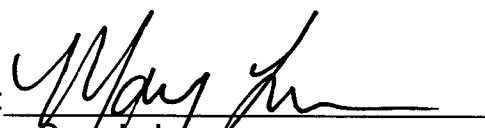
The undersigned counsel hereby certifies that she has served the
foregoing Response to Petition for Rehearing upon all counsel of record by
affixing same with proper postage and placing same with the United States
Postal Service on 14th day of June, 2019 addressed to the following:

H. Fred Kuhn, Jr., Esquire
Moss, Kuhn & Fleming, P.A.
Post Office Drawer 507
Beaufort, SC 29901-0507

David M. Wunder
67 Virginia Dare Drive
Suite 206
Camp Lejeune, NC 28547

Lee E. Berlinsky, Esquire
U.S. Department of Justice
151 Meeting Street, Suite 200
Charleston, SC 29401

HOWELL, GIBSON & HUGHES, P.A.

By: 
Mary Bass Loh
Post Office Box 40
Beaufort, SC 29901-0040
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Beaufort, South Carolina

June 6, 2019

HOWELL, GIBSON AND HUGHES, P.A.
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June 6, 2019

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

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Re: Grays Hill Baptist Church vs. Beaufort County
Civil Action No.: 2012-CP-07-01394
Civil Action No.: Appellate Case No.: 2016-000687
Our File No: 10369 MBL

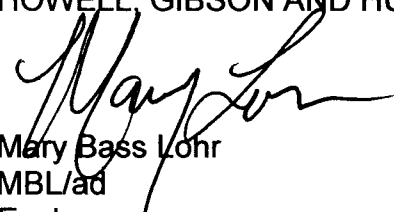
Dear Ms. Kitchings:

Please find enclosed herewith for filing the original and six (6) copies of the *Response to Petition for Rehearing and Proof of Service* with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

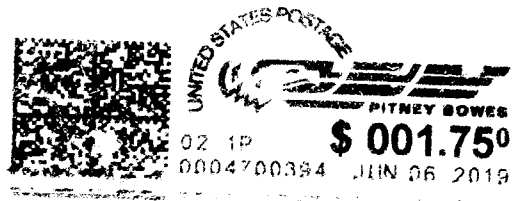
Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.



Mary Bass Lohr
MBL/ad
Enclosure

cc: H. Fred Kuhn, Jr.
Lee E. Berlinsky
David M. Wunder



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