



THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable R. Markley Dennis, Jr., Circuit Court Judge

**RECEIVED**

App. Case No. 2015-002297

JUN 17 2019

SC Court of Appeals

John Doe,

Appellant,

v.

Board of Zoning Appeals (BZA) and  
Town of Sullivans Island (S.I.),  
S. I. Zoning Administrator, and  
S. I. Building Dept., Individually  
and In Official Capacity,


Respondents.

**Motion for Reconsideration In Light of New Precedent and  
Motion for Abeyance of All Time Limits**

C. Holmes  
P.O. Box 187  
Sullivans Isd.,  
SC 29482-0187  
(843)883-3010  
For Appellant

The appellant respectfully submits motion for reconsideration of the Petition for Rehearing with application of new precedent herein and motion for abeyance of all time limits. Specifically, the case of *Citizens for Quality Rural Living, Inc., v. Greenville Cnty. Planning Comm'n* (S.C. App., 2019) (COA Case No. 2017-000170 with remittitur filed in the Circuit Court on June 12, 2019) supports reversal of the May 23, 2019, Petition for Rehearing and reversal of the March 6, 2019, opinion herein. See attached copy of correspondence dated and faxed June 12, 2019. That case supports the appellant's right to file in the circuit court the notice of BZA appeal with request for pre-litigation mediation. Accordingly, appellant respectfully requests this Court grant this motion for reconsideration and grant motion for abeyance of all time limits pending disposition.

Respectfully submitted,

  
C. Holmes  
POB 187  
S.I., SC 29482-0187  
843.883.3010

12 June 2019

By Fax: 803.734.1839

V. Claire Allen  
Deputy Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Post Office Box 11629  
Columbia, SC 29201/29211

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JUN 17 2019

SC Court of Appeals

Re: Doe v BZA et al  
App. Case No. 2015-002297

Dear Ms. Allen:

We are writing to bring to the Court's attention new case law in *Citizens for Quality Rural Living, Inc., v. Greenville Cnty. Planning Comm'n* (S.C. App., 2019) (COA Case No. 2017-000170 with remittitur filed in the Circuit Court today June 12, 2019). Under the ruling in that case, Appellant has standing to file in the lower court the Notice of BZA Appeal with Request for Mediation which supports reversal of the lower court's decision in App. Case No. 2015-002297. We respectfully request review for application of new case law to the above-named pending appeal. Please contact us with any questions. Please advise if you need anything further.

Thank you for your kind attention to this matter. With best personal regards, I remain

Yours very truly,

A handwritten signature, possibly 'S', written in dark ink.

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PROOF OF SERVICE

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I certify that I have timely served the foregoing on the Respondents on this date by deposit in the United States Mail, postage prepaid, addressed to Respondents' attorney of record at 66 Hasell St., Charleston, SC 29401.

Dated 6/14/19

  
C. Holmes  
POB 187  
S.I., SC 29482-0187  
843.883.3010