THE STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED
Apr 22 2020
S.C. SUPREME COURT

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Appellate Case No.2015-002199 (S.C. Ct. App. filed Jan. 24, 2020)

Faye P. Croft, Personally and as Trustee of the James A. Croft Trust; James A. Croft Trust; William A. Harbeson; Heyward G. Hutson; James Stephen Greene, Jr.; South Carolina Public Interest Foundation; Summerville Preservation Society; and Dorchester County Taxpayers Association, individually, and on behalf of all others similarly situated, Petitioners,

v.

Town of Summerville and Town of Summerville Board of Architectural Review, Respondents.

REPLY TO RETURN TO PETITION FOR A WRIT OF CERTIORARI

W. Andrew Gowder, Jr.
Austen & Gowder, LLC
1629 Meeting Street
Charleston, SC 29405
(843) 727-2229
andy@austengowder.com

Michael T. Rose
Mike Rose Law Firm, PC
409 Central Ave.
Summerville, SC 29483
(843) 871-1821
mike@mikeroselawfirm.com

Attorneys for Petitioners

ARGUMENT

This case presents the simple questions of whether the decisions of the Summerville Board of Architectural Review ("BAR") to approve demolition and construction for a controversial project were made in violation of applicable laws and, if so, what is the remedy for those violations. See Austin vs. Board of Zoning Appeals, 362 S.C. 29, 33, 606 S.E.2d 209, 213 (2004)("In reviewing the questions presented by the appeal, the court shall determine only whether the decision of the Board is correct as a matter of law" S.C. Code Ann. § 6-29-840(A) (Supp.2003)(emphasis added)).

BAR decisions cannot be correct as matter of law if they were made in violation of applicable statutes, ordinances and rules governing BAR decisions. The law requires the BAR not only to reach decisions that are legally correct, but also to follow the procedures and apply the criteria required by law in making those decisions.

The BAR, like all government agencies, must comply with applicable laws, and courts may, and should, enforce those laws. State statutes, town ordinances and BAR rules exist to ensure BAR decisions are a product of open, transparent, fair, structured, non-discriminatory, reasonable and orderly processes. The BAR's failures to follow the procedures and criteria required by law can result in skewed, abusive, discriminatory and unfair decisions that benefit special interest groups at the expense of the public, undermine citizens' confidence in their government and harm citizens who have a right to have BAR decisions be made in conformance with the law. There is no point to the statutes, ordinances or rules regulating BARs if BARs can violate those laws with impunity because courts cannot or will not enforce them.

According to S.C. Code Ann. § 6-29-840(A)(Supp.2003), "[t]he findings of fact by the

Board of Appeals must be treated in the same manner as a finding of fact by a jury. . ..” Id. (emphasis added); Austin vs. Board of Zoning Appeals, 362 S.C. 29, 33, 606 S.E.2d 209, 213 (2004). Thus, as with the factual findings of juries, courts should give deference to the factual findings of a BAR. However, BARs, like juries, must follow the law when making their findings/decisions, and, as with juries, courts should not allow findings/decisions of a BAR to stand when the BAR fails to comply with laws in making its findings/decisions.

Petitioners have objected to numerous violations of law by the Respondents. Any one of those violations warrant, and the cumulative effect of all of those violations compel, voiding the findings/decisions of the BAR and requiring the BAR to make new findings/decisions at a new hearing held in accordance with the law.

I. THE BAR VIOLATED OPEN MEETING PROVISIONS OF THE FREEDOM OF INFORMATION ACT, TWO PROVISIONS OF THE SC LOCAL GOVERNMENT COMPREHENSIVE PLANNING ENABLING ACT OF 1994, AND TWO TOWN ORDINANCES BY DELEGATING BAR BUSINESS TO SMALL, SPECIALLY APPOINTED COMMITTEES THAT OPERATED IN SECRET AND OUT OF THE PUBLIC EYE (Reply to Respondents' #1).

In addition to the open meetings provisions of the Freedom of Information Act, S.C. Code Ann. §§ 30-4-10 *et. seq*., the Legislature passed both S.C. Code Ann. § 6-29-870(D) and S.C. Code Ann. § 6-29-920(A) and the Town passed both Summerville Town Ordinance 32-176(d) and Summerville Town Ordinance 32-176(e) as additional special safeguards to ensure that BARs operate with transparency and accountability. These legislative actions evidence the intent and special concerns by both the Legislature and the Town that the public be protected from abuses by BARs and that citizen input be facilitated by requiring BARs to act openly and not secretly.

The Town of Summerville BAR violated these provisions surreptitiously by operating on two tracks or levels. One track was open and on-the-record, apparently in compliance with the

above-referenced provisions. The other track was secretive and involved meetings "behind the scenes" and unknown to the public where groups of specially appointed BAR members consisting of only one less than a quorum of the entire BAR met, discussed and decided with the Town Planner and the Developer what project redesigns the Developer should make and what BAR members would approve at an upcoming BAR meeting scheduled for January 5, 2015, without the public being aware they were meeting and without there being any of the openness and accountability safeguards and protections these statutes and ordinances require (R. pp. 447, 945-947; App. 1274-1280).

It was not until BAR member John Kwist publicly discussed at a January 5, 2015, BAR meeting the secret "workshop" meeting Kwist and other BAR members had attended on December 12, 2014, (R. pp. 447-453), that the public became aware that 100% of the BAR members who would vote publicly at that 1/5/15 BAR meeting whether to approve the redesign of the project had been appointed by the BAR to meet, and had met, with the Developer, the Town Planner and other BAR members, secretly and in two back-to-back shifts at the same location, to discuss and make decisions about the design of the project (R. pp. 447-453, 945-947; App. 1274-1280).

These two meetings on 12/12/14 were officially arranged by the BAR Secretary, who appointed by name in writing the three BAR members who comprised each of the two groups (i.e., committees) that met and who designated when and in which Town room each of the two groups met (R. pp. 945-947). **The BAR Secretary's official designation of the members of each of these two groups for the official purpose of reviewing and discussing the redesign plans for the project was the appointment of a "committee[] . . . and the like" within the meaning of S.C. Code Ann. § 30-4-20**. Each of these two 12/12/14 *ad hoc* committees had three BAR members and since all three members of each appointed *ad hoc* committee attended each of these

meetings, a quorum of each of the committees was present at each of the meetings. Therefore, both of those meetings were subject to the requirements of FOIA, which the BAR violated by holding those *ad hoc* committee "workshop" meetings without public notice, an agenda, minutes and, most importantly, without allowing the public to attend.

At these two secret 12/12/14 meetings of the six BAR members who voted to approve the project redesign on 1/5/15, the BAR members, the Developer and the Town Planner discussed the height, size and mass of the project, conflicts of interest by two of the voting BAR members whose businesses might profit from the project, the purchase by the Town of new land for the project, whether the condominiums and the hotel would be separated by a road or an ally, and other characteristics of the "revised plan" for design of the project. (R. pp. 447-453, 956; App. 1274-1280).

These two secret meetings on 12/12/14 were not innocuous. They were not just informal discussions among a couple of BAR members or of a BAR member with a developer. They were discussions and agreements among the decision makers – all six voting BAR members, the Town Planner and the Developer – in groups specifically appointed by the BAR to meet in a structured setting in a Town room as arranged by the BAR about the content of the redesign of the project that would be submitted to and considered by the BAR at its upcoming 1/5/15 meeting (R. p. 945: "**[T]his is a workshop to give you an opportunity to review plans and discuss concerns from prior meetings**") (emphasis added). At these meetings all voting BAR members, the Developer and the Town Planner discussed and agreed what would be the height (3, not 4 stories), mass and design (e.g., one building, not two, separating condominiums and the hotel) of the project. The decisions made in these two meetings determined the fundamental changes to the design of the project that had been submitted to the BAR but not approved at the BAR at its October 6, 2014,

meeting (compare R. p. 909 with R. pp. 945, 946). Once these fundamental design changes were agreed upon at the 12/12/14 meetings, those changes could not be and were not changed because the Developer had relied on those 12/12/14 decisions when preparing the redesigns for presentation to the BAR at its 1/5/15 meeting. That is evident from the inability at the 1/5/15 BAR meeting of Kwist to overcome the resistance of the Developer to making changes to the fundamental design (e.g., 3 stories, one building 330 yards long instead of two buildings separated) of the project (see R. pp. 447-453; App. 1274-1280).

In addition to violating FOIA, these 12/12/14 meetings of two groups of appointed BAR members also violated S.C. Code Ann. § 6-29-870(D) by not keeping "a record of its examinations" of the Developer's new designs in the secret "workshop" meetings and filing that record with the BAR and making it a public record, *id*.; violated S.C. Code Ann. § 6-29-920(A) by not filing that record with the Circuit Court; violated Town Ordinance 32-176(e), which provides that a quorum shall be required for the BAR to transact business; and violated Town Ordinance 32-176(d), which provides that all BAR meetings shall be open to the public. The BAR transacted business by discussing, negotiating and agreeing among themselves and with the Developer and the Town Planner (both the Developer and the Town were co-applicants whose design was being considered) at those meetings what changes were required in the project design to obtain BAR approval. If the two groups of three did not have a quorum, then they violated Town Ordinance 32-176(e) by transacting Town business without a quorum. If the two groups did have a quorum, they violated Town Ordinance 32-176(d) and FOIA by not having the meetings open to the public.

II. THE BAR VIOLATED FOIA, STATE STATUTES AND TOWN ORDINANCES BY UNREASONABLY RESTRICTING ACCESS TO RELEVANT PUBLIC

FILINGS PRIOR TO BAR MEETINGS AND BY NOT ALLOWING THE PUBLIC TO PARTICIPATE IN AND HEAR, OBSERVE AND COMMENT AT PUBLIC BAR MEETINGS ON THE APPLICATION (Reply to Respondents' #3).

In addition to making decisions at secret meetings to avoid public scrutiny, the BAR violated FOIA and other laws by restricting access to public documents and to the meetings themselves, thereby prohibiting effective citizen input.

Respondents incorrectly claim that Petitioners' complaint that citizens did not have a reasonable opportunity to inspect or copy applications to be considered by the BAR is unsupported by the record. In truth, the document from the East Historic District Civic Association on the BAR Record at R. pp. 957-958 evidences that on January 2, 2015, the Respondents would not allow the public to inspect or to copy the new BAR applications to be considered by the BAR at the BAR's outcome-determinative meeting at which the BAR approved demolition and gave conceptual/preliminary approval on January 5, 2015, regarding which the public had a right to speak according to Summerville Town Ordinance Sec. 32-182(b) (R. pp. 957-958; Brief of Appellants, pp. 41-42**).** That document at R. pp. 957-958 is an official part of the BAR Record; has never been objected to by the Respondents; and therefore should be given as much weight as is given to documents on the BAR Record generated by the BAR.1

Respondents violated S.C. Code Ann § 30-4-30(a) by refusing to allow the public to inspect a BAR application before the BAR meeting at which the application would be considered and, instead, having a policy requiring Appellants and the public to file a written FOIA request for a BAR application and to wait fifteen days to inspect the application **after** the BAR meeting at which

1 That especially is true because BAR meeting minutes have contained errors that the BAR refused to correct. See R. p. 953. There is no basis for giving more credence or weight to documents generated by the BAR than to documents submitted by citizens about the BAR.

the BAR application would be considered. That refusal ensured that the public did not know before the January 5, 2015, BAR meeting the content of the project redesigns that were proposed to and approved by the BAR at that meeting, and that included demolition about which the pubic had a right to speak, and violated S.C. Code Ann § 30-4-30(a).

Similarly, that the public's rights to oppose the project were violated when the BAR abridged the public's ability to see, hear and participate at the key BAR meeting on January 5, 2015 is clearly documented in the Record (R. pp. 957-958; R. pp. 921-922; Brief of Appellants, pp. 42-43). The Record shows that at that 1/5/15 meeting the BAR made the critically important decisions to approve demolition of a structure and give "conceptual/preliminary approval" of the project (R. p. 922). However, as stated by the Court of Appeals, no member of the public was allowed or given an opportunity to speak at that meeting, Opinion No. 5687 at p. 6 ("The [BAR] did not take public comment at this meeting"), including about demolition, even though the public had a right to speak about demolition according to Summerville Town Ordinance Sec. 32-182(b), (id.; Brief of Appellants, pp 39-41); the advertisement the BAR published noticing that meeting specifically had represented that at that meeting the BAR would "accept public comment" (R. p. 865); and the BAR Chairman had represented at the beginning of the meeting that the public would be allowed to speak (R. p. 957).

The BAR also avoided public input by deliberately and unnecessarily causing this critical January 5, 2015, meeting to occur in a "Town Hall Annex – Training Room," (R. p. 916), too small to contain the overflow crowds attempting to attend the meeting instead of in the much larger "Town Hall Annex - Council Chambers," (R. p. 919), meeting room available one floor up in the same building, causing crowds to stand and to sit on the floor in a hallway outside the meeting room without any being able to hear due to the absence of any sound or amplification system and

causing the public not to be able to see, hear or participate in the meeting (R. pp. 956; 957-958; 916-917). 2 These were deliberate, unnecessary and undue burdens imposed on the public to discourage participation that violated the Freedom of Information Act. See Wiedemann v. Town of Hilton Head, 330 S.C. 532 (1998).

The BAR easily could have moved its 1/5/15 meeting from the tiny "Town Hall Annex – Training Room" to the much, much larger "Town Hall Annex - Council Chambers" nearby, but deliberately choose not to do so to minimize citizen input. Respondents' claim that the BAR "used the Board's regular meeting room," (Response, at 11 (emphasis added)), at the 1/5/15 BAR meeting is incorrect. In truth, eight of the nine BAR meetings about this project, including two BAR meetings before 1/5/15, were held in the much larger "Town Hall Annex - Council Chambers," on October 8, 2014; November 3, 2014; January 12, 2015; April 6, 2015; May 11, 2015; June 1, 2015; July 6, 2015; and August 3, 2015 (R. pp. 907, 911, 919, 923, 925, 928, 930, 933, 935, 939). The only meeting the BAR held about the project in the much smaller "Town Hall Annex – Training Room"3 was the one meeting held by the BAR on 1/5/15 (R. p 914). Thus, the BAR deliberately chose this much smaller "Training Room" for this critical 1/5/15 meeting where the BAR approved demolition and gave conceptual/preliminary approval of the project, to avoid and minimize public input.

The BAR also violated the public's rights to try to influence the BAR decisions by failing to provide written notice of the public's right to speak at BAR meetings where the BAR considered the Developer's applications for demolitions of buildings, in violation of Summerville Town

2 These documents evidencing these facts were submitted on the record by the Appellants and not objected to by the Respondents. Therefore, this evidence should be considered as valid and correct as regarding evidence submitted on the record by the Respondents.

3 The name "Training Room" itself implies it is small in comparison to the larger "Council Chambers."

Ordinance Sec. 32-182(b), and by in other respects interfering with the public's right to speak at BAR meetings (Brief of Appellants, pp. 37-38, 39-41, 42-43). Plaintiffs opposed demolition, R. p. 952), and even filed a lawsuit to stop demolition, but **were not allowed to speak to the BAR about demolition** at the 1/5/15 meeting at which the BAR approved demolition. The BAR published notice, as required by Sec. 32-182(b), that the public would have an opportunity to comment at a BAR meeting about proposed demolition only regarding one of the eight BAR meetings where demolition was considered by the BAR, i.e., at the BAR meeting on January 5, 2015, (R. p. 865), but the BAR failed to inform the public it would have an opportunity to speak about demolition at seven other BAR meetings that considered demolition, (R. pp. 864, 865, 866, 867),4 and failed to allow or give an opportunity to any member of the public to speak to the BAR at that January 5, 2015 meeting (Opinion No. 5687, at p. 6; Brief of Appellants, pp. 39-41). Thus, the BAR avoided any public comment about demolition before the Town, based on the BAR's approval of demolition, demolished two buildings Plaintiffs were suing to avoid being demolished.

III. THE CIRCUIT COURT SHOULD NOT HAVE ALLOWED ON THE BAR RECORD AFFIDAVITS, A DECISION, FINDINGS AND CONCLUSIONS, AND MINUTES OF MEETINGS, CREATED BY THE BAR MONTHS AFTER THE BAR'S DECISIONS HAD BEEN MADE AND APPEALED AND AFTER EXPIRATION OF THE THIRTY-DAY DEADLINE (Reply to Respondents' #2).

Petitioners do not object to the BAR submitting on the BAR Record Findings and Conclusions merely because of the date those Findings and Conclusions were signed. Respondents object because the Findings and Conclusions did not exist on, and were created three months after the dates of, the decisions Petitioners appealed and after the filing of the appeals to those decisions.

4 No advertisement was placed stating people could speak at the following BAR meetings where the BAR considered demolition: 10/6/2014; 11/3/2014; 1/12/2015; 4/6/2015; 5/11/2015; 6/1/2015; 7/6/2015; 8/3/2015 (R. pp. 864, 866, 867). In addition, none of the letters of notification sent to adjacent property owners as required by Summerville Town Ord., Sec. 32-176(d) advised the public could comment at the BAR (R. pp. 869-872, 873-874, 875-876, 877-880, 881-883).

Respondents waited until after Petitioners filed their appeals and then, as an afterthought, created and filed seventeen pages of purported findings and conclusions to try to bolster the defense of their case being appealed to rebut Petitioners' specific grounds for appeal.

Section 9-29-930 requires a Circuit Court to remand a matter to a BAR for a "rehearing" "in the event the judge determines that the certified record is insufficient for review." Respondents claim that that rehearing is not *de novo* and is only for the purpose of preparing an order. Petitioners strongly deny those claims. The statute does not indicate that a "rehearing" is not *de novo* or only to prepare an order. The statute requires a "rehearing" in order to prepare a sufficient and proper record when a judge determines the record is insufficient, not merely the creation of an order. The obvious purpose of a "rehearing" to correct an insufficient record is to have a new hearing to create evidence to comprise a sufficient record. That "rehearing" would be *de novo*. If the statute meant that the remand would be merely to create an order, the statute would have so indicated. It did not.

Respondents further mistakenly argue to this Court that BARs typically meet only once a month, when there is no evidence of that on the BAR Record and, on the contrary, this BAR held multiple special meetings with less than a month between meetings to consider the Respondents' application. The BAR could, and did, convene any time and as many times as it wanted in order to consider the application, this appeal or any other facet of this matter.

Further, Respondents mislead by stating that the Petitioners contend that the Respondents could not file a return to the appeal after 30 days. That is not correct. Petitioners do not object to the Respondents filing a Return based on the correct BAR Record. Petitioners object to the Respondents **CREATING** new parts of the BAR record (Findings and Conclusions, Minutes, Affidavits) and filing with the Circuit Court Clerk a BAR Record containing those new parts

"including [the BAR's] findings of fact and conclusions" **AFTER** "thirty days from the BAR's receipt of notices[s]" of appeal, in violation of S.C. Code Ann. § 6-29-920(A). Further, Petitioners object that the Court's accepting the BAR's Findings and Conclusions, Minutes of BAR meetings and Affidavits violated S.C. Code Ann. § 6-29-930(A), which states in part that the "court may not take additional evidence."

IV. THE CIRCUIT COURT INCORRECTLY EXCLUDED FROM THE BAR RECORD MATERIAL EVIDENCE PETITIONERS DESIGNATED TO BE IN THE BAR RECORD SHOWING THAT THE BAR ACTED UPON AND TRANSACTED BAR BUSINESS AT ITS SECRET "WORKSHOP" MEETINGS (Reply to Respondents' #4).

The BAR's two secret "workshop" meetings with the Developer and the Town Planner on December 12, 2014, violated the FOIA, other state statutes and Town ordinances, as stated above. Petitioners further contend that the Kwist Notes showing what happened at those meetings should have been considered by the Court of Appeals when determining whether those 12/12/14 meetings were unlawful, and that excluding the Kwist Notes as evidence considered by the courts helped enable the BAR to get away with conducting its secret meetings without the public transparency required by law regarding the redesign of the project and potentially disqualifying conflicts of interest.

By excluding item #12 from the record, the BAR succeeded in avoiding the appellate review of relevant and material evidence that the BAR was "transact[ing] business" without a quorum of the entire BAR membership in violation of Sec. 32-176(e) and was "acting upon" BAR business in violation of SC Code Ann. § 30-4-70(c).

The Respondents state in their Return:

> Nothing prohibited Qwist (sic) from raising at a public meeting the issue of what was discussed at a gathering of less than a quorum. Nothing prohibited Qwist (sic) from asking that his notes be marked as part of the official records of the Board. That

would have allowed the Board as a whole to address his contentions. That would have made the notes part of the record. But none of that happened.

Petitioners respond by explaining that Kwist was limited by what to him was a very powerful constraint: peer pressure. As shown in the companion case, the BAR members conducted another non-public meeting attended by all BAR members at which BAR members chastised Kwist for making and disclosing notes of the secret meeting he attended on 12/12/14, and for stating what was claimed to be errors in the notes. Kwist sought to avoid conflict, as a result of the pressure on him by other Board members for Kwist's doing what he considered proper. After receiving those criticisms, Kwist resigned from the BAR. This peer pressure to maintain the secrecy of BAR actions illustrates why the BAR's discussions and decisions at the 12/12/14 meetings should have been public.

V. THE COURT OF APPEALS ERRED BY MISTAKENLY SHIFTING THE BURDEN OF CREATING AND PRESERVING THE BAR RECORD ON THE APPELLANTS, WHEN THAT BURDEN WAS ON THE BAR (Reply to Respondents' #5).

Respondents suggest that Petitioners have waived their objections to untimely applications submitted to the BAR outside the ten- and fourteen-day deadlines required by Summerville Town Ordinance Sec. 32-176(i), 32-181(c)(6), by not having voiced those objections at BAR meetings. However, Petitioners were not allowed by the BAR to see the applications before the BAR hearings at which they would be considered, in violation of the FOIA as stated above, and therefore could not determine the timeliness of the applications before the meetings at which they were considered. Further, Petitioners would not have been able to object to untimely applications at BAR meetings where they were not allowed to speak, as at the critical BAR meeting on 1/5/15. Pubic input was rendered ineffective or a nullity when the public was deprived of information before BAR

meetings or not allowed to speak at all, especially at the critical meetings where decisions were made, such as the approval of demolition and the conceptual/preliminary approval given at the 1/5/15 BAR meeting.

Respondents answered those allegations by stating "Of course, it is Appellants' duty to show there was some error. There is no evidence the applications were not submitted in a timely fashion" (Respondents Final Brief, p. 10). In addition, Respondents stated "it is Appellants' duty to show error. The Appellant is merely speculating as to when applications were submitted" (Respondents Final Brief, p. 11).

Those claims by the Respondents are not correct. That the applications were not submitted within the time limits of Sec. 32-176(i), 32-181(c)(6), is evidenced circumstantially by the facts that the BAR did not have a date on any of the Developer's applications, (Brief of Appellants, at 23), and refused to let the public inspect or copy any of those applications before the BAR meeting at which the applications were considered (R. pp. 957-958; Brief of Appellants, pp. 41-42**)**. Moreover, Respondents are in error when they claim that even when specific statutes and ordinances impose specific requirements on the operation of the BAR, the BAR can avoid enforcement of those requirements simply by not documenting the BAR's failures to comply with the requirements and then claiming no enforcement is allowed because there is no evidence of a violation. Implicit in the requirements in the statutes and ordinances that the BAR provide the Circuit Court a record of its actions when its decisions are appealed, S.C. Code Ann. § 6-29-920(A), is that the BAR document that it has complied with these mandates.

The BAR completely controls what it accepts on its Record and has the statutory duty, S.C. Code Ann. § 6-29-920(A), to give the Circuit Court a complete copy of the Record it created when an appeal to a BAR's decision has been filed. The BAR must have the responsibility of

documenting its compliance with the legal requirements imposed on it, including allowing people to speak when Summerville Town Ordinance Sec. 32-182(b) gives them a right to speak and submitting a complete BAR record when S.C. Code Ann. § 6-29-920(A) mandates it do so. If the BAR is not responsible for documenting compliance and instead the public has to prove the BAR's non-compliance, the BAR can avoid virtually any judicial scrutiny simply by omitting evidence of its non-compliance from the Record.

Respectfully submitted,

/s/ W. Andrew Gowder, Jr.
W. Andrew Gowder, Jr. (S.C. Bar # 7895)
Austen & Gowder, LLC
1629 Meeting Street, Suite A
Charleston, SC 29405
Phone: (843) 727-2229
Email: andy@austengowder.com

Michael T. Rose (S.C. Bar # 4910)
Mike Rose Law Firm, PC
409 Central Ave.
Summerville, SC 29483
(843) 871-1821
Email: mike@mikeroselawfirm.com
Attorneys for Appellants

April 22, 2020
Charleston, South Carolina