

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM Horry County
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

CASE NO. 2016-CP-26-06495

RECEIVED
APR 24 2020
S.C. Court of Appeals

Cornell Patton, Melissa Patton, Chad Webb and Amy Webb..... Appellants

vs.

Prestwick Land Limited Partnership; Prestwick Homeowners Association, Inc.;
Jackson Companies; City of Myrtle Beach; South Carolina Department of Transportation;
Horry County; Myrtle Beach Air Force Base Redevelopment Authority; Nelson L.
Hardwick & Associates, Inc.; Bermuda Gardens Homeowners' Association d/b/a
Homeowners of Ocean Walk Property Owners Association; Campgrounds, Inc.; and
Prestwick Property Owners Association, Inc., Defendants

OF WHICH:

Prestwick Land Limited Partnership, Jackson Companies and
Campgrounds, Inc. are Respondents

City of Myrtle Beach, Third-Party Plaintiff,

vs.

Phil Eaves and Elizabeth Eaves, Third-Party Defendants,
Counterclaimants, Cross-Claimants..... Appellants

PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of the **Final Reply Brief of Appellants** on the Respondents, on the 23rd day of April, 2020, by depositing a copy of same in the United States Mail, postage prepaid, to:

Carmen V. Ganjehsani, Esquire
Richardson Plowden & Robinson, P..A.
P. O. Drawer 7788
Columbia, SC 29202

Douglas C. Baxter, Esquire.
Richardson Plowden & Robinson, P.A.
P. O. Box 3646
Myrtle Beach, SC 29578

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 23rd day of April, 2020.

Donna H. Hand
Notary Public for South Carolina
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS
*OF COUNSEL

AREA CODE 843
238-5648
FAX: 238-5050

April 23, 2020

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
APR 24 2020
SC Court of Appeals

Re: *Cornell Patton, et al. v. Prestwick Land Limited Partnership, et al.*
Appellate Case No. 2019-000964
C/A No. 2016-CP-26-06495
Our File No. 2015-0293C

Dear Ms. Kitchings:

Enclosed please find the following original (unbound) documents for filing in the above-captioned case:

- Record on Appeal with Certificate of Counsel;
- Final Brief of Appellants with Certificate of Counsel and Proof of Service;
- Final Reply Brief of Appellants with Certificate of Counsel and Proof of Service.

Consistent with conversation with the Clerk's Office, it is our understanding that we need not file additional copies of these documents at this time and that the Court will advise us as to when additional copies of these documents are to be filed.

By copy of this letter, we hereby serve the Respondents, through counsel of record, with the Final Brief of Appellants and Final Reply Brief of Appellants. The Record on Appeal was previously served on the Respondents and Proof of Service provided to the Court pursuant to Rule 210(a).

Thank you for your kind assistance in this matter.

Sincerely yours,


Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures

cc w/enc: Carmen V. Ganjehsani, Esquire
Douglas C. Baxter, Esquire

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<i>Kelaker, Connell & Connor, PC</i> 1500 US HIGHWAY 17 NORTH, SUITE 209 POST OFFICE DRAWER 14547 SURFSIDE BEACH, SC 29587
To The Honorable Jenny Abbott Kitchings South Carolina Court of Appeals 1220 Senate Street Columbia, South Carolina 29201