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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM THE CHARLESTON COUNTY COURT OF COMMON PLEAS  
Mikell R. Scarborough, Circuit Court Judge

**RECEIVED**

JUN 15 2020

Case No. 2019-CP-10-0717

**SC Court of Appeals**

City of Folly Beach, Coastal Conservation League, Save Folly Beach, Inc., John Collins,  
Matt Napier, Paula Stubblefield, Troy Bode, and Carol Kruer ..... Appellants,

vs.

State of South Carolina, Amy Connelly, Jeffrey H. Morris, Michael Vandaele, Stephen Rawe,  
Juan Enterprises, LLC, Juanita A Wright, Debbie's Folly, LLC, and  
Vernon Staubes, ..... Respondents,

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**NOTICE OF APPEAL**

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The City of Folly Beach, Coastal Conservation League, Save Folly Beach, Inc, John Collins, Matt Napier, Paula Stubblefield, Troy Bode, and Carol Kruer hereby appeal from the Order Granting Defendants' Motions to Dismiss and Motions for Judgment on the Pleadings, issued by the Honorable Mikell R. Scarborough, Circuit Court Judge, on May 11, 2020.

\* \* \*

*Michael G. Corley*

by: Amy  
Armstrong  
w/permission

Michael G. Corley  
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June 10, 2020

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Juan Enterprises, LLC, Juanita A Wright, Debbie's Folly, LLC, and  
Vernon Staubes, ..... Respondents,

---

**CERTIFICATE OF SERVICE**

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I hereby certify that on this date I served the foregoing Notice of Appeal upon the  
Respondents by filing same through the South Carolina E-filing system, with electronic  
notification distributed to the following:

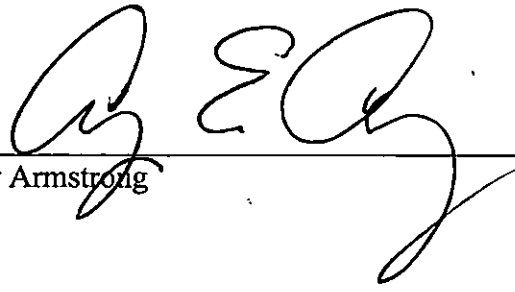
Jeff Tibbals, Esq.  
Attorney for Amy Connelly and Debbie's Folly, LLC

Emory Smith, Esq.  
Attorney for the State of South Carolina

Rita Barker, Esq.  
Attorney for Juanita Wright and Juan Enterprises, LLC

Bruce Wallace, Esq.  
Attorney for Stephen Rawe and Jeffrey Morris

Kerry Koon, Esq.  
Attorney for Vernon Staubes

A handwritten signature in black ink, appearing to read 'Amy Armstrong', written over a horizontal line.

Amy Armstrong

Georgetown, South Carolina  
June 10, 2020



# South Carolina Environmental Law Project

*Lawyers for the Wild Side of South Carolina*

a1501c3

non-profit organization

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Honorable Jenny Abbott Kitchings  
Clerk, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

RE: City of Folly Beach, et al. v. State of South Carolina, et al.  
Case No. 2019-CP-10-0717

Dear Mr. Kitchings:

I am enclosing for filing the Appellants' Notice of Appeal, along with my certificate of service and filing fee. Kindly return a clocked-in copy in the envelope provided.

Thank you for your kind consideration and assistance with this matter.

Yours very truly,

Amy Armstrong

cc: Jeff Tibbals, Esq.  
Emory Smith, Esq.  
Rita Barker, Esq.  
Bruce Wallace, Esq.  
Kerry Koon, Esq.

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