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SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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

Case No. 2019-CP-10-0717

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,

NOTICE OF APPEAL

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
Leslie S. Lenhardt
SOUTH CAROLINA ENVIRONMENTAL LAW
PROJECT

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June 10, 2020

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STATE OF SOUTH CAROLINA
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Juan Enterprises, LLC, Juanita A Wright, Debbie’s Folly, LLC, and
Vernon Staubes, Respondents,

CERTIFICATE OF SERVICE

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:

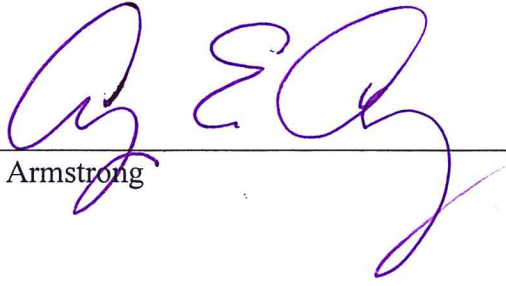
Jeff Tibbals, Esq.
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Kerry Koon, Esq.
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Amy Armstrong

Georgetown, South Carolina
June 10, 2020

Certificate of Electronic Notification

Recipients

Rita Barker - Notification transmitted on 06-10-2020 01:57:04 PM.

Michael Corley - Notification transmitted on 06-10-2020 01:57:04 PM.

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***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2019CP1000717

Official File Stamp: 06-10-2020 01:56:50 PM
Court: CIRCUIT COURT
Common Pleas
Charleston
Case Caption: Folly Beach City Of , plaintiff, et al VS South Carolina State Of , defendant, et al
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
Filed by or on behalf of: Michael Gary Corley

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

Jeffrey Scott Tibbals, Sr. for Amy Connelly
Robert Bruce Wallace for Jeffrey H Morris,
Stephen Rawe
Michael Gary Corley for Folly Beach City Of et al
Kerry W. Koon for Vernon Staubes
Evan Patrick Williams
Leslie S. Lenhardt for Folly Beach City Of et al
Rita Bolt Barker for Juan Enterprises LLC
J. Emory Smith, Jr. for South Carolina State Of
Mary Duncan Shahid for Stephen Rawe

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:

Debbies Folly LLC
Juanita A Wright



South Carolina Environmental Law Project

Lawyers for the Wild Side of South Carolina

June 10, 2020

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SC Court of Appeals

a 501c3

non-profit organization

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Staff Attorney

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Jessie A. White

Staff Attorney

Lauren Megill Milton

Lucey Law Fellow

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

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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.