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**Oct 30 2020**

**SC Court of Appeals**

STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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

Appellate Case No. 2020-000937

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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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**APPELLANTS' AMENDED DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

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The Appellants propose the following material to be included in the Record on Appeal:

1. Final Order, dated May 11, 2020.
2. Complaint, filed February 12, 2019.
3. Plaintiffs' Response to Motion to Dismiss, filed January 23, 2020.
4. Plaintiffs' Proposed Order, submitted to the court March 9, 2020.
5. Plaintiffs' Return to Defendants' Reply, filed April 30, 2020.
6. Affidavit of Spencer Wetmore – January 23, 2020.
7. Affidavit of Matt Napier – January 22, 2020.
8. Affidavit of Carol Kruer – January 22, 2020.

s/Michael G. Corley

Michael G. Corley

Leslie Lenhardt

South Carolina Environmental Law Project

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Attorneys for the Appellants

Georgetown, South Carolina  
October 30, 2020

Certificate of Counsel

The undersigned does hereby certify that this Designation of Matter complies with SCACR 209(c) in that it contains no matter which is irrelevant to the appeal.

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

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**CERTIFICATE OF SERVICE**

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I hereby certify that on this date I served the foregoing Amended Initial Brief and Designation of Matter upon the Respondents by electronic mail, 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. and Mary Shahid, Esq.  
Attorneys for Stephen Rawe and Jeffrey Morris

Kerry Koon, Esq.  
Attorney for Vernon Staubes

s/Michael G. Corley  
Michael G. Corley

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Georgetown, South Carolina  
October 30, 2020

## Initial Brief, City of Folly Beach v. State of SC

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**Subject:** Re: Initial Brief, City of Folly Beach v. State of SC  
**Date:** Friday, October 30, 2020 9:51 AM  
**Size:** 829 KB

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Hi folks, I am attaching the Appellants' amended initial brief and designation of matter, with the only difference being the correction of deficiencies noted in the Court's correspondence. Thanks.

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Michael Corley  
Upstate Director  
South Carolina Environmental Law Project  
(864) 412-7921

On Wed, Oct 21, 2020, at 3:48 PM, Michael Corley wrote:

Attached for service, please find the Appellants' Initial Brief and Designation of Matter in the above-referenced case.

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Michael Corley  
Upstate Director  
South Carolina Environmental Law Project  
(864) 412-7921

### Attachments:

- [initial brief final.pdf](#)
- [designation of matter final.pdf](#)

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[initial brief corrected.pdf](#) 536 KB

[designation of matter corrected.pdf](#) 66 KB