

94418

**RECEIVED**

JUL 14 2021

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

---

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

---

CASE NO. 20-CP-22-00932  
CASE NO. 20-CP-22-00931  
CASE NO. 20-CP-22-00930

---

Sunset Lodge, LLC, .....Appellant,

v.

Town of Pawleys Island,.....Respondent;

Franklin D. Beattie, as trustee of the Franklin D. Beattie  
Preservation Trust, .....Appellant,

v.

Town of Pawleys Island,.....Respondent; and

M. Baron Stanton, .....Appellant,

v.

Town of Pawleys Island,.....Respondent.

---

**NOTICE OF APPEAL**

---

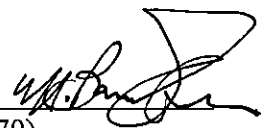
In these consolidated cases, Plaintiffs each appeal the following respective orders in each  
Plaintiff's case as follows:

Sunset: the order of The Honorable Benjamin H. Culbertson entered in Case 20-CP-22-00932 April 22, 2021 (dismissing case) and the order of The Honorable Benjamin H. Culbertson entered in Case 20-CP-22-00932 June 3, 2021 (denying motion to reconsider). Plaintiff received written notice of entry of the April 22 order on April 22 and filed and served a motion to reconsider on April 28. Plaintiff received notice of entry of the June 3 order on June 3, 2021.

Beattie: the order of The Honorable Benjamin H. Culbertson entered in Case 20-CP-22-00931 April 22, 2021 (dismissing case) and the order of The Honorable Benjamin H. Culbertson entered in Case 20-CP-22-00931 June 3, 2021 (denying motion to reconsider). Plaintiff received written notice of entry of the April 22 order on April 22 and filed and served a motion to reconsider on April 28. Plaintiff received notice of entry of the June 3 order on June 3, 2021.

Stanton: the order of The Honorable Benjamin H. Culbertson entered in Case 20-CP-22-00930 April 22, 2021 (dismissing case) and the order of The Honorable Benjamin H. Culbertson entered in Case 20-CP-22-00930 June 3, 2021 (denying motion to reconsider). Plaintiff received written notice of entry of the April 22 order on April 22 and filed and served a motion to reconsider on April 28. Plaintiff received notice of entry of the June 3 order on June 3, 2021.

s/M. Baron Stanton  
M. Baron Stanton (S.C. Bar No. 7970)  
STANTON LAW OFFICES, P.A.  
1230 Richland Street  
P. O. Box 245  
Columbia, SC 29202



803-929-1484 (Use 803-530-2642.)  
bstanton@stantonlaw.com  
ATTORNEY FOR APPELLANTS  
SUNSET LODGE, LLC AND FRANKLIN D.  
BEATTIE, AS TRUSTEE, AND PRO SE (FOR M.  
BARON STANTON)

Other Counsel of Record:

William C. Dillard, Jr., Esquire (S.C. Bar No. 78986)  
P. O. Box 96  
Columbia, SC 29202  
803-929-0096  
will@belsarpa.com  
ATTORNEY FOR RESPONDENT  
TOWN OF PAWLEYS ISLAND

N. David DuRant, Sr., Esquire (S.C. Bar No. 1803)  
P.O. Box 14722  
Surfside Beach, SC 29587  
843-650-7800  
ddurant@lawofficesofdurant.com  
ATTORNEY FOR RESPONDENT  
TOWN OF PAWLEYS ISLAND

Norwood D. DuRant, Jr. (S.C. Bar No. 101723)  
P.O. Box 14722  
Surfside Beach, SC 29587  
843-650-7800  
norwooddurant@lawofficesofdurant.com  
ATTORNEY FOR RESPONDENT  
TOWN OF PAWLEYS ISLAND

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

JUL 14 2021

**SC Court of Appeals**

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

CASE NO. 20-CP-22-00932  
CASE NO. 20-CP-22-00931  
CASE NO. 20-CP-22-00930

Sunset Lodge, LLC, .....Appellant,

v.

Town of Pawleys Island,.....Respondent;

Franklin D. Beattie, as trustee of the Franklin D. Beattie  
Preservation Trust, .....Appellant,

v.

Town of Pawleys Island,.....Respondent; and

M. Baron Stanton, .....Appellant,

v.

Town of Pawleys Island,.....Respondent.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was served on the following, as a result of conventional mailing to the following address and electronically filing the same in the

Circuit Court on this date:

William C. Dillard, Jr., Esquire  
P. O. Box 96  
Columbia, SC 29202

s/M. Baron Stanton  
M. Baron Stanton

A handwritten signature in black ink, appearing to read "M. Baron Stanton", written over a horizontal line.

Date: July 2, 2021

STANTON LAW OFFICES, P.A.

POST OFFICE BOX 245  
COLUMBIA, SOUTH CAROLINA 29202

~~1728 MAIN STREET~~  
COLUMBIA, SOUTH CAROLINA 29201

July 12, 2021

TELEPHONE 803-929-1484  
TELECOPIER/FAX 803-929-0534

M. BARON STANTON  
ATTORNEY AT LAW

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

Re: **Sunset Lodge, LLC** v. Town of Pawleys Island, C.A. No. 2020CP2200932,  
under which are consolidated:  
**Sunset Lodge, LLC** v. Town of Pawleys Island, C.A. No. 2020CP2200932;  
**Franklin D. Beattie, as trustee** v. Town of Pawleys Island, C.A. No.  
2020CP2200931; and  
**M. Baron Stanton** v. Town of Pawleys Island, C.A. No. 2020CP2200930

Dear Ms. Kitchings:

We enclose the following:

1. The Notice of Appeal, with proof of service;
2. Copies of our correspondence with the court reporters requesting 4/1/21 and 6/3/21 transcripts;
3. Copies of each of the 4/22/21 and 6/3/21 orders of the Honorable Benjamin H. Culbertson, appealed herein; and
4. A check for the \$250.00 filing fee.

We electronically filed a copy of the Notice of Appeal with the lower court on July 2, 2021, which process automatically served it on the other party to the appeal. We also mailed a copy to the other party.

The Court Administration and the opposing party were also copied with our correspondence with the court reporters.

These three cases were consolidated in the Circuit Court and involve the same defendant and similarly affected property and many of the same issues. Each of the orders appealed from address the case the same way as in the other two cases.

**RECEIVED**

JUL 14 2021

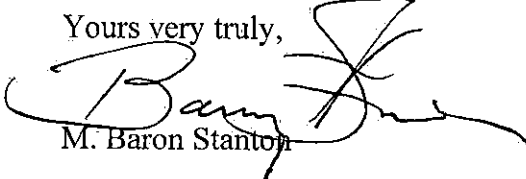
**SC Court of Appeals**

STANTON LAW OFFICES, P.A.

The Honorable Jenny Abbott Kitchings  
July 12, 2021  
Page 2

Thank you for your assistance.

With kind regards,

Yours very truly,  
  
M. Baron Stanton

MBS:abt

cc w/out encl.: William C. Dillard, Jr., Esquire



STANTON LAW OFFICES, P.A.

POST OFFICE BOX 245  
COLUMBIA, SOUTH CAROLINA 29202

**RECEIVED**  
JUL 14 2021  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211