

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

Frances Baty, Helene Lambert, Michael Evatt,  
O. D. Strickland, Keith Godfrey, Bonnie  
Spearman, Allison Morton, Brian Morton,  
Janet Lamb, and Henry Lamb,

Appellants Below,

v.

Greenville County Planning Commission and  
Mark III Properties, LLC,

Respondents.

of whom Frances Baty, O. D. Strickland, and  
Keith Godfrey,

Appellants.

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IN THE COURT OF COMMON PLEAS  
THIRTEENTH JUDICIAL CIRCUIT

C.A. No. 2021CP2301494

and

C.A. No. 2021CP2301501

**APPELLANTS' NOTICE OF FILING  
NOTICE OF APPEAL**

**RECEIVED**

**Oct 11 2021**

**SC Court of Appeals**

Appellants Frances Baty, O. D. Strickland, and Keith Godfrey, through undersigned  
counsel hereby give notice of the filing of Notice of Appeal with the South Carolina Court of  
Appeals on September 22, 2021 with Appellate Case No. 2021-001063.

s/J. J. Andrighetti

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s/Christopher T. Brumback

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SC Court of Appeals

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CRIMINAL DEFENSE  
PERSONAL INJURY

October 11, 2021

**VIA UPLOAD TO ONEDRIVE**

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

Re: *Baty et al. v. Greenville County Planning Commission et al.*  
*C.A. Nos. 2021CP2301494 & 2021CP2301501*

Dear Ms. Kitchings:

Enclosed herewith, please find the requested Notice of Appeal that was filed with the Clerk of Court for Greenville County in the above-referenced cases. If you have any questions or require anything further from my office, please do not hesitate to contact me at (864) 414-9097. Counsel for Respondents is being served with a copy of this correspondence via electronic mail to [bbannister@bannisterwyatt.com](mailto:bbannister@bannisterwyatt.com) and [crantley@devlawsc.com](mailto:crantley@devlawsc.com).

With kindest regards, I am

Truly yours,

s/Christopher T. Brumback

Christopher T. Brumback, Esq.  
Brumback & Langley, LLC

CTB/

cc: Bruce Bannister (via email)  
Chris Antley (via email)