

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
MAR 29 2013

Appeal from the Court of Common Pleas
For Charleston County
Honorable Roger M. Young, Circuit Judge
Civil Action No.: 2009-CP-10-267

SC Court of Appeals

3 Chisolm Street Homeowners Association, Inc.,

Plaintiff-Appellant,

v.

Chisolm Street Partners, LLC, Murray School
Partners, LLC, Genoa Construction Services, Inc.,
Masterpiece Millwork, Inc., Allen Roper, Jr. d/b/a
Masonry Brickwork and Stucco, John Doe #1, John
Doe #2, and Brock Green Architects and Planners, LLC,

Defendants,

Of whom Genoa Construction Services, Inc.,
Masterpiece Millwork, Inc., and Brock Green
Architects and Planners, LLC, are the

Respondents.

Genoa Construction Services, Inc.,

Third-Party Plaintiff,

v.

The Fox Steel Company, Carolina Services, Inc.,
Lesco Restoration, Inc., Ferst Plastering, Inc.,
Charleston Glass & Mirror Company, 3d Renovations,
Williams Mechanical, Mastercraft Interior & Exterior,
Coastal Glass and Block, Adams Davis & Partners,
and Troy Pardee Heating and Air Conditioning
(d/b/a Pardee Heating and Air), CT Windows Limited,
and Architectural Materials & Systems,

Third-Party Defendants,

Lesco Restoration, Inc.,

Fourth-Party Plaintiff,

v.

Coastal Waterproofing, Inc. n/d/b/a Wards
Waterproofing, Inc.,

Fourth-Party Defendants.

**RESPONDENT MASTERPIECE MILLWORK, INC.'S DESIGNATION OF MATTERS
TO BE INCLUDED IN RECORD ON APPEAL**

In addition to the materials previously designated by the Appellant and those designated by Respondent Brock Green Architects and Planners, LLC, Respondent Masterpiece Millwork, Inc. proposes that the following materials be included in the Record on Appeal:

1. Plaintiff's Second Am. Summons and Compl., filed Apr. 8, 2010;
2. Genoa's Answer to Appellant's Amended Complaint filed May 26, 2009;
3. Genoa's Answer to Appellant's Second Amended Complaint filed May 11, 2010;
4. Masterpiece Millwork, Inc.'s Answer to Second Amended Complaint filed May 25, 2011;
5. Masterpiece Millwork, Inc.'s Answer to Genoa Construction Service, Inc.'s Crossclaims filed May 25, 2011
6. Genoa Construction Services, Inc.'s Memorandum in Support of Summary Judgment, or, in the Alternative Partial Summary Judgment filed Mar. 28, 2011 and attachments thereto;
7. Masterpiece Millwork, Inc.'s Motion for Summary Judgment filed September 1, 2011 and attachments thereto;
8. Order granting Masterpiece Millwork, Inc.'s Motion for Summary Judgment filed May 25, 2012;
9. Board of Directors Meeting 3 Chisolm Street HOA June 10, 2003; and
10. Affidavit of Ray Moses.

I certify that this designation contains no matter which is irrelevant to this appeal.

[signature on next page]

Respectfully submitted,



Jenny Costa Honeycutt
Haynsworth Sinkler Boyd, P.A.
134 Meeting Street, Third Floor
Charleston, SC 29401-2240
(843) 724-1121
jhoneycutt@hsblawfirm.com
**Attorneys for Respondent Masterpiece
Millwork, Inc.**

March 28, 2013

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
MAR 29 2013

Appeal from the Court of Common Pleas
For Charleston County
Honorable Roger M. Young, Circuit Judge
Civil Action No.: 2009-CP-10-267

SC Court of Appeals

3 Chisolm Street Homeowners Association, Inc.,

Plaintiff-Appellant,

v.

Chisolm Street Partners, LLC, Murray School
Partners, LLC, Genoa Construction Services, Inc.,
Masterpiece Millwork, Inc., Allen Roper, Jr. d/b/a
Masonry Brickwork and Stucco, John Doe #1, John
Doe #2, and Brock Green Architects and Planners, LLC,

Defendants,

Of whom Genoa Construction Services, Inc.,
Masterpiece Millwork, Inc., and Brock Green
Architects and Planners, LLC, are the

Respondents.

Genoa Construction Services, Inc.,

Third-Party Plaintiff,

v.

The Fox Steel Company, Carolina Services, Inc.,
Lesco Restoration, Inc., Ferst Plastering, Inc.,
Charleston Glass & Mirror Company, 3d Renovations,
Williams Mechanical, Mastercraft Interior & Exterior,
Coastal Glass and Block, Adams Davis & Partners,
and Troy Pardee Heating and Air Conditioning
(d/b/a Pardee Heating and Air), CT Windows Limited,
and Architectural Materials & Systems,

Third-Party Defendants,

Lesco Restoration, Inc.,

Fourth-Party Plaintiff,

v.

Coastal Waterproofing, Inc. n/d/b/a Wards
Waterproofing, Inc.,

Fourth-Party Defendants.

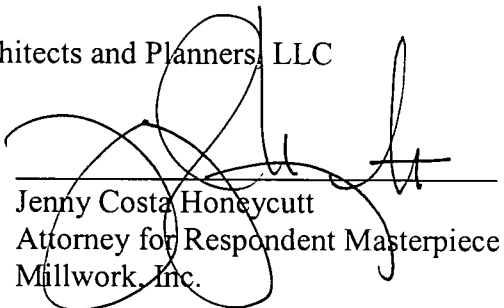
PROOF OF SERVICE

I have served a copy the Respondent Masterpiece Millwork, Inc.'s Designation of Matters to be Included in Record on Appeal by depositing a copy of it in the United States Mail, postage prepaid, on March 29, 2013, upon the attorneys of record by placing the same in the United States mail, first class postage prepaid, addressed to the following

David J. Parrish, Esquire
Paul A. Dominick, Esquire
Nexsen Pruet, LLC
PO Box 486
Charleston, SC 29402
(843) 720-1771
Attorneys for Appellant 3 Chisolm Street Homeowners Association, Inc.

Franklin H. Turner, Esq.
Rogers Townsend & Thomas, PC
PO Box 100200
Columbia, SC 29202
(803) 744-1826
Attorneys for Respondent Genoa Construction Services, Inc.

Kent T. Stair, Esquire
Carlock, Copeland & Stair, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
(843) 727-0307
Attorneys for Respondent Brock Green Architects and Planners, LLC



Jenny Costa Honeycutt
Attorney for Respondent Masterpiece
Millwork, Inc.

March 29, 2013

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals Clerk of Court
1015 Sumter Street
Columbia, SC 29201

Re: 3 Chisolm Street Homeowners Association, Inc. v. Chisolm Street Partners, LLC, Genoa
Construction Services, Inc., Masterpiece Millwork, Inc., et al. and Genoa Construction
Services, Inc. v. The Fox Steel Co., et al.
Case No.: 2009-CP-10-267
Court of Appeals Case No.: 2012207850

Dear Ms. Kitchings:

Enclosed for filing are the originals and one copy each of the following:

1. Initial Appellate Brief of Respondent Masterpiece Millwork, Inc. with Proof of Service;
and,
2. Respondent Masterpiece Millwork, Inc.'s Designation of Matters to be Included in
Record on Appeal

I would appreciate it very much if you would file the Brief and the Designation with the Court
and then return clocked copies to me in the enclosed envelope.

With Best Regards,



Jenny Costa Honeycutt

JCHJ/lah
Enclosure

cc: David J. Parrish, Esquire
Franklin H. Turner, III, Esquire
Kent T. Stair, Esquire

RECEIVED

MAR 29 2013

SC Court of Appeals