

RECEIVED

Aug 01 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Case No. 2018-CP-10-5468

Ranjiv Saini,

Appellant,

v.

Baranov Flooring, LLC, et. al.,

Respondent.

**NOTICE OF APPEAL**

Ranjiv Saini appeals the order Granting Summary Judgment as to Plaintiff's Claims Against Baranov Flooring, LLC, of the Honorable Edgar W. Dickson dated May 13, 2022, and the Order Denying Plaintiff's Motion to Reconsider or Alter or Amend the Court's Order Granting Baranov Flooring, LLC's Motion for Summary Judgment, of the Honorable Edgar W. Dickson dated June 30, 2022. Appellant received written notice of entry of this order via the electronic filing system on June 30, 2022. A copy of the contact information for all other counsel of record that remain involved in the lawsuit is attached to this Notice of Appeal.

July 28, 2022

Sincerely,

/s/ James L. Floyd, III ("Lee")  
THE FLOYD LAW FIRM  
S.C. Bar No. 74957  
3255 Maybank Highway  
Johns Island, SC 29455  
(843) 258-1200  
[lfloyd@floydlawsc.com](mailto:lfloyd@floydlawsc.com)

Albert Bilbrey, Jr.  
COOPER & BILBREY  
Federal Court ID 12938  
South Carolina Bar 103799  
[agbilbrey@jhcooper.com](mailto:agbilbrey@jhcooper.com)  
P.O. Box 22513  
Charleston, SC 29413  
843-883-9099

ELECTRONICALLY FILED - 2022 Jul 28 3:35 PM - CHARLESTON - COMMON PLEAS - CASE#2018CP1005468

F 843-883-9335

-AND-

Eric K. Gressman, Esquire (*Pro Hac Vice*)  
KELLEY KRONENBURG  
1111 Brickell Ave., Suite 1900  
Miami, FL 33131

**Attorneys for Appellant**

Charleston, South Carolina

Other Counsel of Record:

Stacey P. Canaday, Esquire  
Tupper, Grimsley, Dean & Canaday, P.A.  
PO BOX 2055  
Beaufort, SC 29901-2055  
[staceycanaday@tgdcpa.com](mailto:staceycanaday@tgdcpa.com)

Attorney for Respondent  
(843) 524-1116

*Ranjiv Siani v. Arnett Construction, LLC, et. al.*, Case No. 2018-CP-10-5468  
List of All Counsel of Record

Katherine Walker, Esquire  
R. Michael Ethridge, Esquire  
Dylan C. Kidd, Esquire  
Ethridge Law Group, LLC  
1100 Queensborough Blvd., Suite 200  
Mount Pleasant, SC 29464  
[kwalker@ethridgelawgroup.com](mailto:kwalker@ethridgelawgroup.com)  
[dkidd@ethridgelawgroup.com](mailto:dkidd@ethridgelawgroup.com)  
[ksenseny@ethridgelawgroup.com](mailto:ksenseny@ethridgelawgroup.com)  
*Counsel for Arnett Construction, LLC*

John E. Robinson, Esquire  
36 Broad Street  
Charleston, SC 29401  
[john.robinson@charlestonlawoffice.com](mailto:john.robinson@charlestonlawoffice.com)  
*Counsel for S.Arch+Studio, LLC and John Sullivan*

Phillip P. Cristaldi, III, Esquire  
Jeffrey A. Ross, Esquire  
Kirkley G. White, Esquire  
1242 White Flat Road  
Mt. Pleasant, SC 29464  
[pcristaldi@rcaalaw.com](mailto:pcristaldi@rcaalaw.com)  
*Counsel for EnviroFoam Technologies*

L. Dean Best, Esquire  
Jenkins H. Wilson, Esquire  
Best Honeycutt, P.A.  
Post Office Box 13466  
102 Wappoo Creek Drive  
Suite 8 (29412)  
Charleston, SC 29422  
[jenkins@besthoneycutt.com](mailto:jenkins@besthoneycutt.com)  
[dean@besthoneycutt.com](mailto:dean@besthoneycutt.com)  
T: (843) 793-4744  
*Counsel for Cohen's Drywall*

Stacey P. Canaday, Esquire  
Tupper, Grimsley, Dean & Canaday, P.A.  
PO BOX 2055  
Beaufort, SC 29901-2055  
[staceycanaday@tgdcpa.com](mailto:staceycanaday@tgdcpa.com)  
*Counsel for Baranov Services, Inc.*

**RECEIVED**

**Aug 01 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

Case No. 2018-CP-10-5468

Ranjiv Saini,

Appellant,

v.

Baranov Flooring, LLC, et. al.,

Respondent.

**PROOF OF SERVICE**

I certify that I have served the Notice of Appeal on Baranov Flooring, LLC, by the electronic filing system used by the South Carolina Court Courts, on July 28, 2022, and depositing a copy of it in the United States Mail, postage prepaid, on July 30, 2022, addressed to its attorney of record, Stacey P. Canaday, Post Office Box 2055, Beaufort, South Carolina 29901-2055.

July 28, 2022

/s/ James L. Floyd, III  
James L. Floyd, III ("Lee")  
THE FLOYD LAW FIRM  
S.C. Bar No. 74957  
3255 Maybank Highway  
Johns Island, SC 29455  
(843) 258-1200  
[lfloyd@floydlawsc.com](mailto:lfloyd@floydlawsc.com)

Albert Bilbrey, Jr.  
COOPER & BILBREY  
Federal Court ID 12938  
South Carolina Bar 103799  
[agbilbrey@jhcooper.com](mailto:agbilbrey@jhcooper.com)  
P.O. Box 22513  
Charleston, SC 29413  
843-883-9099  
F 843-883-9335

-AND-

Eric K. Gressman, Esquire (*Pro Hac Vice*)  
KELLEY KRONENBURG  
1111 Brickell Ave., Suite 1900  
Miami, FL 33131

**Attorneys for Appellant**



3255 Maybank Highway,  
Johns Island, SC 29455  
Tel: (843) 258-1200/Fax: (843) 790-9235  
lfloyd@floydlawsc.com/www.floydlawsc.com

July 30, 2022

**RECEIVED**  
**Aug 01 2022**  
**SC Court of Appeals**

**VIA U.S. MAIL & EMAIL**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: Ranjiv Saini, Appellant, v. Branov Flooring, LLC, Respondent, et. al.,  
Case No. 2018-CP-10-5468

Dear Ms. Kitchings:

Enclosed for filing is a notice of appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the notice of appeal on the respondent.
- (2) A copy of the orders which are to be challenged on appeal.
- (3) A check from my office for the filing fee of \$250.
- (4) The hearing transcript request form and correspondence to the court reporter sending the Request.

Please let my office know if we can provide any additional information for the Court.

Sincerely,

/s/ James L. Floyd, III  
THE FLOYD LAW FIRM  
S.C. Bar No. 74957  
3255 Maybank Highway  
Johns Island, SC 29455  
(843) 258-1200  
[lfloyd@floydlawsc.com](mailto:lfloyd@floydlawsc.com)

Attorney for Appellant

Other Counsel of Record:

Stacey P. Canaday, Esquire  
Tupper, Grimsley, Dean & Canaday, P.A.  
PO BOX 2055  
Beaufort, SC 29901-2055

[staceycanaday@tgdcpa.com](mailto:staceycanaday@tgdcpa.com)

Attorney for  
Respondent  
(843) 524-1116

Cc: Other Counsel of Record via E-mail only (see attached list)

*Ranjiv Siani v. Arnett Construction, LLC, et. al.*, Case No. 2018-CP-10-5468  
List of All Counsel of Record

Katherine Walker, Esquire  
R. Michael Ethridge, Esquire  
Dylan C. Kidd, Esquire  
Ethridge Law Group, LLC  
1100 Queensborough Blvd., Suite 200  
Mount Pleasant, SC 29464  
[kwalker@ethridgelawgroup.com](mailto:kwalker@ethridgelawgroup.com)  
[dkidd@ethridgelawgroup.com](mailto:dkidd@ethridgelawgroup.com)  
[ksensene@ethridgelawgroup.com](mailto:ksensene@ethridgelawgroup.com)  
*Counsel for Arnett Construction, LLC*

John E. Robinson, Esquire  
36 Broad Street  
Charleston, SC 29401  
[john.robinson@charlestonlawoffice.com](mailto:john.robinson@charlestonlawoffice.com)  
*Counsel for S.Arch+Studio, LLC and John Sullivan*

Phillip P. Cristaldi, III, Esquire  
Jeffrey A. Ross, Esquire  
Kirkley G. White, Esquire  
1242 White Flat Road  
Mt. Pleasant, SC 29464  
[pcristaldi@rcaalaw.com](mailto:pcristaldi@rcaalaw.com)  
*Counsel for EnviroFoam Technologies*

L. Dean Best, Esquire  
Jenkins H. Wilson, Esquire  
Best Honeycutt, P.A.  
Post Office Box 13466  
102 Wappoo Creek Drive  
Suite 8 (29412)  
Charleston, SC 29422  
[jenkins@besthoneycutt.com](mailto:jenkins@besthoneycutt.com)  
[dean@besthoneycutt.com](mailto:dean@besthoneycutt.com)  
T: (843) 793-4744  
*Counsel for Cohen's Drywall*

Stacey P. Canaday, Esquire  
Tupper, Grimsley, Dean & Canaday, P.A.  
PO BOX 2055  
Beaufort, SC 29901-2055  
[staceycanaday@tgdcpa.com](mailto:staceycanaday@tgdcpa.com)  
*Counsel for Baranov Services, Inc.*