

RECEIVED

Oct 31 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM Horry COUNTY  
Court of Common Pleas

Honorable R. Markley Dennis, Jr., Circuit Court Judge  
Honorable William H. Seals, Jr., Circuit Court Judge

Case No. 2018-CP-26-03173

**Appellate Case No.: 2022-001529**

Frederick E. Brown, Charles O. Pakosta, Conrad A. Calvano, Gayle N. Scott and Philip D. Cox, individually and derivatively on behalf of Myrtle Beach Resort Homeowners' Association, Inc. and on behalf of all other similarly situated Co-Owners, and Lori Niedzwiecki and Robert S. Rosencrans, individually and derivatively on behalf of the Myrtle Beach Resort Homeowners' Association, Inc. for its right and benefit .....Appellants

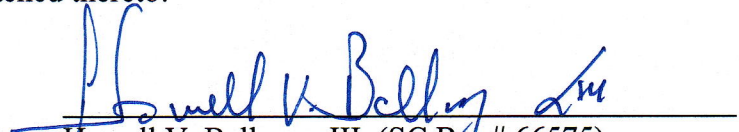
v.

Jeffrey L. Richardson and Nancy L. Moore, individually and as current members of the Board of Directors for Myrtle Beach Resort Homeowners' Association, Inc., and Peter A. Grusauskas and Jim Perkins, individually and as former members of the Board of Directors for Myrtle Beach Resort Homeowners' Association, Inc., .....Respondents.

**PROOF OF SERVICE**

The undersigned certifies that he is employed with the law firm of Bellamy, Rutenberg, Copeland, Epps, Gravely & Bowers, P.A., attorneys for the Appellants, Frederick E. Brown, Charles O. Pakosta, Conrad A. Calvano, Gayle N. Scott and Philip D. Cox, individually and derivatively on behalf of Myrtle Beach Resort Homeowners' Association, Inc. and on behalf of all other similarly situated Co-Owners, and Lori Niedzwiecki and Robert S. Rosencrans, individually and derivatively on behalf of the Myrtle Beach Resort Homeowners' Association, Inc. for its right

and benefit, that he has mailed a copy of the **Notice of Appeal** listed below this **31<sup>st</sup> day of October, 2022**, with proper postage attached thereto:



Howell V. Bellamy, III, (SC Bar # 66575)  
BELLAMY, RUTENBERG, COPELAND,  
EPPS, GRAVELY & BOWERS, P.A.  
[hbellamyiii@bellamylaw.com](mailto:hbellamyiii@bellamylaw.com)  
P.O. Box 357  
Myrtle Beach, SC 29578  
(843) 448-2400

Charles B. Jordan, Jr., Esquire, (SC Bar #: 11708)  
The Pearce Law Group, PC  
[cjordan@pearcelawgroup.com](mailto:cjordan@pearcelawgroup.com)  
1314 Professional Drive  
Myrtle Beach, SC 29577  
(843) 839-3210 Ext 103

Counsel for Appellants

**Other Counsel of Record:**

Robert Bruce Wallace, Esquire  
Andrew A. Mathias, Esquire  
Nexsen Pruet, LLC  
205 Kin Street, Suite 400  
Charleston, SC 29401  
[BWallace@nexsenpruet.com](mailto:BWallace@nexsenpruet.com)  
[AMathias@nexsenpruet.com](mailto:AMathias@nexsenpruet.com)  
*Attorneys for Respondents Jeffrey L.  
Richardson, Nancy L. Moore, Peter A.  
Grusauskas and Jim Perkins*

Robert E. Lee, Esquire  
PO Box 1096  
Marion, SC 29571  
[rel@rellawfirm.com](mailto:rel@rellawfirm.com)  
*Attorneys for Myrtle Beach Resorts  
Homeowners' Association, Inc.*

Edward D Buckley, Jr., Esquire  
Nicholas James Rivera, Esquire  
PO Box 993  
Charleston, SC 29402  
[NRivera@yrcrlaw.com](mailto:NRivera@yrcrlaw.com)  
*Attorneys for Myrtle Beach Resort  
Homeowners' Association, Inc.*

Myrtle Beach, South Carolina

October 31, 2022