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Dec 06 2022

SC Court of Appeals

ELECTRONICALLY FILED - 2022 Dec 05 11:39 AM - BEAUFORT - COMMON PLEAS - CASE#2022CP0700632

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

R. Ferrell Cothran, Jr., Circuit Court Judge

Appellate Case No. 2022-001587

315 Corley CW LLC; 368 Mount Pelia LLC; Bridge Charleston Investments B LLC; Bridge Charleston Investments C LLC; Bridge Charleston Investments E LLC; Bridge Charleston Investments H LLC; Anne Bosler and Dylan Hart as Trustees of the Bosler-Hart Trust; Geoffrey J. Block; R. Jeffrey Kimball and Deborah S. Kimball; Sebrina Leigh-Jones and Chris Leigh-Jones; Jennifer Albero; Live Oak Assets LLC; Matthew N. Lynch and Barbara A. Lynch; MKM 22 West LLC; One Rumford Lane LLC; Salt Works LLC; and TTJR LLC; individually, derivatively, and as class representatives Respondents/Cross-Appellants,

v.

Palmetto Bluff Development, LLC; Palmetto Bluff Club, LLC; Palmetto Bluff Real Estate Company, LLC; PLBH, LLC; Montage Palmetto Bluff, LLC; Palmetto Bluff Preservation Trust, Inc.; Palmetto Bluff Preservation Trust Board of Stewards: Jordan Phillips; Mark Polites; Gray Ferguson; Henry Armistead; South Street Partners LLC; John Does 1-25 Appellants/Cross-Respondents.

CROSS-NOTICE OF APPEAL

Respondents/Cross-Appellants 315 Corley CW LLC; 368 Mount Pelia LLC; Bridge Charleston Investments B LLC; Bridge Charleston Investments C LLC; Bridge Charleston Investments E LLC; Bridge Charleston Investments H LLC; Anne Bosler and Dylan Hart as Trustees of the Bosler-Hart Trust; Geoffrey J. Block; R. Jeffrey Kimball and Deborah S. Kimball; Sebrina Leigh-Jones and Chris Leigh-Jones; Jennifer Albero; Live Oak Assets LLC; Matthew N. Lynch and Barbara A. Lynch; MKM 22 West LLC; One Rumford Lane LLC; Salt Works LLC; and TTJR LLC; individually, derivatively, and as class representatives (collectively Cross-Appellants) cross-appeal certain portions of the Order dated September 15, 2022 (attached as Exhibit A), the Amended Order dated November 2, 2022 (attached hereto as Exhibit B), and the Order dated November 8, 2022 (attached hereto as Exhibit C).

Respondents received written notice of the entry of the Order denying Defendants' Motion to Alter or Amend on November 8, 2022, and received Appellants' notice of appeal on November 14, 2022.

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/ Ian Ford

Ian S. Ford (S.C. Bar No. 12463)

Ian.Ford@FordWallace.com

Ainsley F. Tillman (S.C. Bar No. 70551)

Ainsley.Tillman@FordWallace.com

Hunter H. James (S.C. Bar No. 78877)

Hunter.James@FordWallace.com

715 King Street | Charleston, SC 29403
(843) 277-2011

Attorneys for Respondents/Cross-Appellants 315 Corley CW LLC; 368 Mount Pelia LLC; Bridge Charleston Investments B LLC; Bridge Charleston Investments C LLC; Bridge Charleston Investments E LLC; Bridge Charleston Investments H LLC; Anne Bosler and Dylan Hart as Trustees of the Bosler-Hart Trust; Geoffrey J. Block; R. Jeffrey Kimball and Deborah S. Kimball; Sebrina Leigh-Jones and Chris Leigh-Jones; Jennifer Albero; Live Oak Assets LLC; Matthew N. Lynch and Barbara A. Lynch; MKM 22 West LLC; One Rumford Lane LLC; Salt Works LLC; and TTJR LLC; individually, derivatively, and as class representatives

Other Counsel of Record

Val H. Stieglitz, SC Bar No. 5356
Nexsen Pruet, LLC
1230 Main Street, Suite 700 (29201)
Post Office Drawer 2426
Columbia, SC 29202
Telephone: 803.771.8900
Facsimile: 803.253.8277
Email: VStieglitz@nexsenpruet.com

Bruce Wallace, SC Bar No. 11653
Nexsen Pruet, LLC
205 King Street, Suite 400

Charleston, SC 29401
Telephone: 843-720-1760
Email: BWallace@nexsenpruet.com

Attorneys for Appellants/Cross-Respondents Palmetto Bluff Development, LLC; Palmetto Bluff Club, LLC; Palmetto Bluff Real Estate Company, LLC; PBLH, LLC; Montage Palmetto Bluff, LLC; Palmetto Bluff Preservation Trust, Inc.; Palmetto Bluff Preservation Trust Board of Stewards: Jordan Phillips; Mark Polites; Gray Ferguson; Henry Armistead; South Street Partners, LLC; John Does 1-25.

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PROOF OF SERVICE

I certify that on November 23, 2022, I have served the Cross-Notice of Appeal on Appellants/Cross-Respondents Palmetto Bluff Development, LLC; Palmetto Bluff Club, LLC; Palmetto Bluff Real Estate Company, LLC; PLBH, LLC; Montage Palmetto Bluff, LLC; Palmetto Bluff Preservation Trust, Inc.; Palmetto Bluff Preservation Trust Board of Stewards: Jordan Phillips; Mark Polites; Gray Ferguson; Henry Armistead; South Street Partners LLC; John Does 1-25 by emailing a copy of the same, together with Exhibits A through C, to the following counsel of record using the primary email address listed in the Attorney Information System:

Val H. Stieglitz: VStieglitz@nexsenpruet.com

Bruce Wallace: BWallace@nexsenpruet.com

Respectfully submitted,

FORD WALLACE THOMSON LLC

s/ Ian Ford

Ian S. Ford (S.C. Bar No. 12463)

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