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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Bentley Price, Circuit Court Judge

Case No. 2017-CP-10-05245
Case No. 2017-CP-10-05246
Appellate Case No. 2022-001187

Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiff,

v.

(See ensuing pages for continued caption)

RECORD ON APPEAL
Volume III

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John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc., John Wieland Homes of Charleston, Inc., John Wieland Homes, Inc., Builder Support Services of the Carolinas, Inc., Wheelock Street Capital, LLC d/b/a John Wieland Homes and Neighborhoods, Inc., Wheelock Street Real Estate Land Fund, LP, Wheelock Street Investment Management, LLC, RP Falcon Properties, LLC, Residential Partners, LLC, Middlesex Holdings, LLC, WS JWH, LLC, JWC Phoenix, LLC, Bridgemill Land, LLC, Annisquam Development, LLC, JW Land Investment, LLC, JWC Guildford, LLC, OOTB, LLC, Wieland Realty Associates, Inc., John Wieland, individually, Sue Wieland, Lindsey Parker, Robert Parker, Jack Wieland, Jeorge Medina, Jeorge Medina a/k/a JMC Construction, LLC, John Does (20-50), and Jane Does (41-50), AC Construction, Inc., Scott Parker, individually, Builders FirstSource- Southeast Group, LLC, Muhler, LLC a/k/a The Muhler Company, Inc., YKK (U.S.A.), Inc., Wheelock Street Real Estate Fund II, LP, Wheelock Street Real Estate Fund V, LP, WSREF, NRT, LLC, JW Homes, LLC, JWH RPIV, LLC, RP Falcon Land, LLC, Wieland Realty, LLC, RP Falcon Realty, LLC, Residential Partners IV, LLC, Paul M. Vasquez, Neighborhood Management Associates, Inc., Billie and Antonio Arias a/k/a Antonio Arias Framing Construction, Tru-Don Contracting, Inc., Fine Builders, LLC, Jose Alfredo Sandoval, Chad Larsen d/b/a Chad Larsen Co., Ivan Jose Paiz d/b/a Jose Construction, William B. Angel, East Coast Wall Systems, Inc., Tracyinne Construction a/k/a T&C Construction, LLC, Frankcisco and Andrea Dacosta d/b/a AAA Coastline, Inc., Jack R. Clark d/b/a Jack Clark Construction, LLC, Alex Welch, Tracy McCuiston d/b/a Mastercraft Interior and Exterior, Universal Forest Products Eastern Division, Inc. a/k/a UFP Eastern Division, Inc., Gonzalo Guerrero, A-Marc, Inc., Emmanuel Kehagis d/b/a Creative Construction, Anthony Kirksey, Polly S. Clark d/b/a Glenn Clark Construction, Benjamin Mora a/k/a Benjamin L. Mora d/b/a Mora Construction f/k/a Mora's Construction and Benjamin Mora Construction, LLC n/k/a Mora Construction, LLC, Daniel L. Rogers d/b/a Rogers Roofing Co., Inc. n/k/a Dan Rogers Roofing, LLC, William C. Mulhern d/b/a Bill's Painting, Mark A. McFarland d/b/a In the Wind, Inc., Harbor Master, Inc., Chad Hood, Kinco Ltd. d/b/a Atrium Companies, Inc. d/b/a Atrium Windows and Doors, Inc. a/k/a HR Windows, The Contractor Yard, Inc., New Construction Drywall Hanger, LLC f/k/a New Construction Drywall Hanger, Inc., Doug Pilcher, and Michael Cassidy, DBC Construction Services, LLC, Gerardo Rosette Sanchez a/ k/a GR Painting, LLC, Jesus Mora a/k/a

J. Mora Brick & Block Mason, LLC, Juan Luis Sanchez a/k/a Sanchez Brothers Painting, Latitude Construction Services, LLC, Richard Ditullio a/k/a RDT Contracting, LLC, Valencia Medina, and J&R Construction, LLC, a/k/a JJ&R Construction, LLC, Cohen's Drywall Company, LLC, All American Roofing and Construction, LLC, and Leor Construction, LLC, Defendants.

AND

Builders FirstSource-Southeast Group, LLC, Third-Party Plaintiff,

v.

AC Construction, Corp., Third-Party Defendant.

AND

RP Falcon Properties, LLC (f.k.a JW Homes, LLC); RP Falcon Land, LLC (f.k.a. JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC, Third-Party Plaintiffs,

v.

COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC, Third-Party Defendants.

AND

One Hamlin Place Townhome Association, Inc., Plaintiff,

v.

John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc., John Wieland Homes of Charleston, Inc., John Wieland Homes, Inc., Builder Support Services of the Carolinas, Inc., Wheelock Street Capital, LLC d/b/a John Wieland Homes and Neighborhoods, Inc., Wheelock Street Real Estate Land Fund, LP, Wheelock Street Investment Management, LLC, RP Falcon Properties, LLC, Residential Partners, LLC, Middlesex Holdings, LLC, WS JWH, LLC, JWC Phoenix, LLC, Bridgemill Land, LLC, Annisquam Development,

LLC, JW Land Investment, LLC, JWC Guildford, LLC, OOTB, LLC, Wieland Realty Associates, Inc., John Wieland, individually, Sue Wieland, Lindsey Parker, Robert Parker, Jack Wieland, Jeorge Medina, Jeorge Medina a/ k/a JMC Construction, LLC, John Does (20-50), and Jane Does (41-50), AC Construction, Inc., Scott Parker, individually, Builders FirstSource-Southeast Group, LLC, Muhler, LLC a/k/a The Muhler Company, Inc., YKK (U.S.A.), Inc., Wheelock Street Real Estate Fund II, LP, Wheelock Street Real Estate Fund V, LP, WSREF, NRT, LLC, JW Homes, LLC, JWH RPIV, LLC, RP Falcon Land, LLC, Wieland Realty, LLC, RP Falcon Realty, LLC, Residential Partners IV, LLC, Paul M. Vasquez, Neighborhood Management Associates, Inc., Billie and Antonio Arias a/k/a Antonio Arias Framing Construction, Tru-Don Contracting, Inc., Fine Builders, LLC, Jose Alfredo Sandoval, Chad Larsen d/b/a Chad Larsen Co., Ivan Jose Paiz d/b/a Jose Construction, William B. Angel, East Coast Wall Systems, Inc., Tracyinne Construction a/k/a T&C Construction, LLC, Frankcisco and Andrea Dacosta d/b/a AAA Coastline, Inc., Jack R. Clark d/b/a Jack Clark Construction, LLC, Alex Welch, Tracy McCuiston d/b/a Mastercraft Interior and Exterior, Universal Forest Products Eastern Division, Inc. a/k/a UFP Eastern Division, Inc., Gonzalo Guerrero, A-Marc, Inc., Emmanuel Kehagis d/b/a Creative Construction, Anthony Kirksey, Polly S. Clark d/b/a Glenn Clark Construction, Benjamin Mora a/k/a Benjamin L. Mora d/ b/a Mora Construction f/k/a Mora's Construction and Benjamin Mora Construction, LLC n/k/a Mora Construction, LLC, Daniel L. Rogers d/b/a Rogers Roofing Co., Inc. n/k/a Dan Rogers Roofing, LLC, William C. Mulhern d/b/a Bill's Painting, Mark A. McFarland d/b/a In the Wind, Inc., Harbor Master, Inc., Chad Hood, Kinco Ltd. d/b/a Atrium Companies, Inc. d/ b/a Atrium Windows and Doors, Inc. a/k/a HR Windows, The Contractor Yard, Inc., New Construction Drywall Hanger, LLC f/k/a New Construction Drywall Hanger, Inc., Doug Pilcher, and Michael Cassidy, DBC Construction Services, LLC, Gerardo Rosette Sanchez a/ k/a GR Painting, LLC, Jesus Mora a/k/a J. Mora Brick & Block Mason, LLC, Juan Luis Sanchez a/k/a Sanchez Brothers Painting, Latitude Construction Services, LLC, Richard Ditullio a/k/a RDT Contracting, LLC, Valencia Medina, and J&R Construction, LLC, a/k/a JJ&R Construction, LLC, Cohen's Drywall Company, LLC, All American Roofing and Construction, LLC, and Leor Construction, LLC, Defendants.

AND

Builders FirstSource-Southeast Group, LLC, Third-Party Plaintiff,

v.

AC Construction, Corp., Third-Party Defendant.

AND

RP Falcon Properties, LLC (f.k.a JW Homes, LLC); RP Falcon Land, LLC (f.k.a. JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); And Residential Partners, LLC, Third-Party Plaintiffs,

v.

COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC, Third-Party Defendants,

of which RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f/k/a JW Land Investment, LLC); RP Falcon Realty, LLC (f/k/a Wieland Realty, LLC); and Residential Partners, LLC are the Appellants,

and Jeorge Medina, Jeorge Medina a/k/a JMC Construction, LLC, and All Exteriors Construction, LLC are the Respondents.

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STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiffs vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (F/k/a JW Land Investment, LLC); RP Falcon Realty, LLC (f/k/a Wieland Realty, LLC); and Residential Partners, LLC, Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC, Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 RP FALCON PROPERTIES, LLC F/K/A JW HOMES, LLC, RP FALCON LAND, LLC, F/K/A JW LAND INVESTMENT, LLC, RP FALCON REALTY, LLC, F/K/A WIELAND REALTY, LLC, AND RESIDENTIAL PARTNERS, LLC MEMORANDUM IN OPPOSITION TO JORGE MEDINA, AND JORGE MEDINA A/K/A JMC CONSTRUCTION, LLC A/K/A JMC CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT

RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as the "RP Companies") hereby submit this

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memorandum in opposition to Defendant Jorge Medina, And Jorge Medina A/K/A JMC Construction, LLC A/K/A JMC Construction, Inc.'s ("JMC") Motion for Summary Judgment.

Introduction

This is a motion for summary judgment by a subcontractor against a general contractor on the general contractor's claims for equitable indemnity. This motion should be denied as under South Carolina law a general contractor is not automatically liable for the negligence of its subcontractors. See Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80,89 (2008). Instead, whether, and to what extent a general contractor is liable for the negligence of its subcontractors is a question for the fact-finder to determine. Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

Background

This is a construction defect action arising out of the construction of 11 townhomes known as One Hamlin Place ("One Hamlin"). RP Falcon Properties, LLC F/K/A JW Homes, LLC ("JW Homes") served as the general contractor for buildings 5 through 11 at One Hamlin Place (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as "One Hamlin Phase II"). The Certificates of Occupancy ("CO") for One Hamlin Phase II were issued between April 23, 2013 and November 25, 2014 and identify JW Homes or JW Homes LLC as the contractor. See Exhibit A. The COs for Buildings 1 through 4 of One Hamlin were issued between August 5, 2009 and April 5, 2012 and identify John Wieland Homes & Neighborhood of the Carolinas as the contractor. See Exhibit B.

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Plaintiffs filed this action against the RP Companies[1], among others, alleging deficiencies in the construction of the townhomes at One Hamlin. The RP Companies answered the Plaintiffs' complaint denying liability and filing cross-claims and a third-party complaint seeking indemnity from various subcontractors who performed the work at One Hamlin Phase II, alleging that these subcontractors must identify the RP Companies if and to the extent that the RP Companies are found liable to Plaintiffs for damages relating to the subcontractors' work. JMC was a subcontractor who performed work at Buildings 5 and 6 at One Hamlin Phase II and has moved for summary judgment as to the RP Companies' claims. See purchase orders and invoices reflecting work performed by JMC ("Exhibit C") and JMC's Memorandum in Support at page 5. This motion should be denied as JMC cannot establish that the undisputed facts show that JMC is entitled to judgment against the RP Companies as a matter of law.

Argument

I. JMC is not Entitled to Summary Judgment on the RP Companies' claim for Indemnity.

Genuine issues of material fact exists as to whether, and to what extent, the RP Companies are entitled to recover indemnity from JMC for JMC's work at One Hamlin Phase II. JW Homes did not self-perform the construction at One Hamlin Phase II. See Affidavit of JT McMickle ("Exhibit D"). Instead it paid subcontractors, such as JMC, to perform the construction, including the work at One Hamlin Phase II claimed to be

[1] Plaintiffs allege a theory of amalgamation against JW Homes and other entities, including the RP Companies, relating to a series of transactions that occurred between 2009 through 2012. Plaintiffs claim that these entities and a number of others are amalgamated and that for purposes of any judgment that may be rendered in favor of the Plaintiffs, these entities should be treated as a single business enterprise. Therefore, while RP Falcon Properties, LLC F/K/A JW Homes, LLC was the general contractor for One Hamlin Phase II, for the purposes of this motion, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (the "RP Companies") are each entitled to indemnity to the extent that Plaintiffs prove they are amalgamated.

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deficient in this suit. Id. and Exhibit C. While the RP Companies deny Plaintiffs' claims, Plaintiffs seek damages from the RP Companies for JMC's work at One Hamlin Phase II. JMC installed the siding at Buildings 5 and 6. See Exhibit C. Plaintiffs contend there are deficiencies with the installation of the siding at those buildings.[2] Specifically, Plaintiffs' experts claim as defective and call for the complete removal and replacement of the siding installed by JMC:

instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2" ring shank hot dipped galvanized siding nail with a 0.22" nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

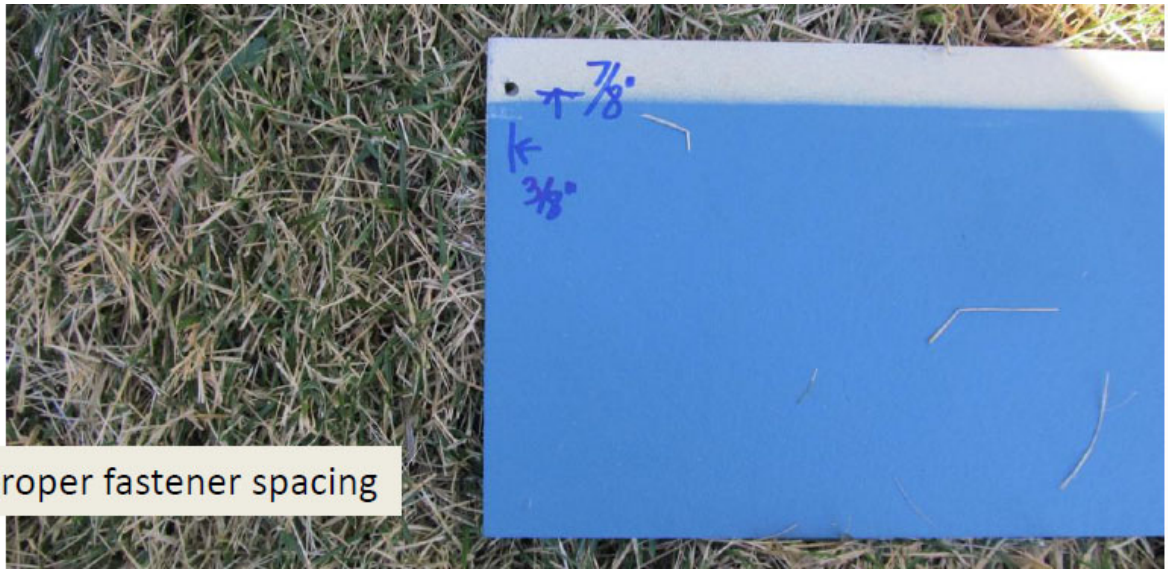
1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

Excerpts from the report of Myles Glick, AIA, dated March 8, 2018 at page 3. (Exhibit E)

[2] To survive summary judgment, the RP Companies need only show that at least some of JMC's work at One Hamlin Phase II is complained-of. For the sake of expediency and economy of briefing this memo does not purport to include a full listing of JMC's complained-of work at One Hamlin Phase II.

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Q. Gotcha. What is the other issue?
A. And then the spacing between the -- is more than 16 inches, and these studs are 16 inches on this building. And then all the pictures surrounding it illustrate the same thing. It's a long board. And then 21 actually is the HardiePlank label, so it is HardiePlank. 22, it's nailed too close to the butt joint. And almost on an inch; it's 7/8ths. So it's fairly close, but it's just too close to the edge. It should be an inch. It's 3/8ths. There's just not a holding power of the board left.



Improper fastener spacing

Deposition of Myles Glick, AIA dated March 8, 2019, page 135 line 2 – line 13 (Exhibit F) and photo from Myles Glick's file referenced in the above testimony.

Q. But your opinion is that the siding needs to be replaced?
A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Deposition of Myles Glick, AIA dated March 11, 2019, page 268 line 5 – page 268 line 9. (Exhibit F).

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Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

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used?

A Yes. That's the second part of item two under Recommendations where I document that condition.

Deposition of R. Mease, dated March 14, 2019, page 136 line 19 – page 137 line 4. (Exhibit G)

JMC argues that the RP Companies cannot maintain an equitable indemnity claim against the subcontractors based on the "negligence rule" that prevents joint tortfeasors from recovering from one another under a claim for equitable indemnity. As an initial point, the RP Companies have standing to assert equitable indemnity claims because "[a] general contractor's relationship with its subcontractor in the residential construction context is sufficient to support the general contractor's right of equitable indemnity against the subcontractor." Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

> "To recover damages on its equitable indemnity claim, [the general contractor] must prove the following: (1) [the subcontractor] was at fault in causing [the homeowner's] water intrusion damages; (2) [the general contractor] has no fault for those damages; and (3) [the general contractor] incurred expenses that were necessary to protect its interest in defending against [the homeowner's] claim."

Id.

In Stoneledge, the Court of Appeals held that a general contractor does not necessarily share in the fault of defective work put in place by its subcontractors, and

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therefore, is able to recover from a subcontractor under a claim for equitable indemnity. Id.; See also Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80,89 (2008)(A general contractor is not automatically responsible for the negligence of a subcontractor).

Accordingly, because the RP Companies can prove at trial that they do not necessarily share in the fault of the alleged defective siding installation performed by JMC, genuine issues of material fact exist as to whether, and to what extent, the RP Companies can recover indemnity from JMC. Id.; Exhibit D. This factual dispute will not be resolved until trial when Plaintiffs' claims against the RP Companies, and the RP Companies' indemnity claims against its subcontractors, are heard and resolved.

II. JMC's Motion regarding "disguised indemnity" under Stoneledge should be denied.

JMC argues that the RP Companies' crossclaims for negligence, breach of warranty and breach of contract are not independent causes of action but merely "disguised indemnity claims." JMC's Memorandum in Support at page 9 – 12. The RP Companies do not dispute that, under Stoneledge, its negligence, breach of warranty, and breach of contract causes of action form the substantive basis for its indemnity claim. However, these causes of action are not a veiled indemnity claim because the RP Companies will introduce evidence of the subcontractors' breaches that underpin the indemnity claim. As such, these claim, whether labeled "causes of action" or "basis for indemnity" are valid and should not be dismissed.

Conclusion

JMC's motion for summary judgment should be denied, and the matter of the JMC's potential liability to the RP Companies should be submitted to the jury after all the

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evidence is heard on Plaintiffs' claims against the RP Companies and the RP Companies' claims against JMC.

Respectfully submitted,

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Exhibit A

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/20/2014

PERMIT # RN-13-097683

PROJECT NAME: JW Homes

ADDRESS: 3061 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

07/26/2013

PERMIT # RN-12-092021

PROJECT NAME: John Wieland

ADDRESS: 3041 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

06/04/2013

PERMIT # RN-12-092020

PROJECT NAME: John Wieland Homes

ADDRESS: 3045 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

06/03/2013

PERMIT # RN-12-092015

PROJECT NAME: John Wieland Homes

ADDRESS: 3049 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/28/2014

PERMIT # RN-13-097682

PROJECT NAME: JW Homes

ADDRESS: 3053 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/20/2014

PERMIT # RN-13-097681

PROJECT NAME: JW Homes

ADDRESS: 3057 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/04/2014

PERMIT # RN-13-099693

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3065 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/16/2014

PERMIT # RN-13-099694

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3069 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/17/2014

PERMIT # RN-13-099696

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3073 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/19/2014

PERMIT # RN-13-099702

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3077 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/25/2014

PERMIT # RN-14-103063

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3081 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/25/2014

PERMIT # RN-14-103066

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3085 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Townhome
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification



T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/24/2014

PERMIT # RN-14-103071

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3089 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/24/2014

PERMIT # RN-14-103072

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3093 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/02/2014

PERMIT # RN-13-101762

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2032 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/15/2014

PERMIT # RN-13-101734

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2036 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/29/2014

PERMIT # RN-13-101728

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2040 Amenity Park Dr.
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/09/2014

PERMIT # RN-13-101727

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2044 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Townhome
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/19/2014

PERMIT # RN-13-096959

PROJECT NAME: JW Homes

ADDRESS: 2016 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/11/2014

PERMIT # RN-13-096939

PROJECT NAME: JW Homes

ADDRESS: 2020 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/22/2014

PERMIT # RN-13-096936

PROJECT NAME: JW Homes

ADDRESS: 2024 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

12/19/2013

PERMIT # RN-13-096932

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502
Mt Pleasant

PROPERTY ADDRESS: 2028 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Single Family Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/17/2013

PERMIT # RN-12-091555

PROJECT NAME: John Wieland

ADDRESS: 2000 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Dwelling 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2749

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/23/2013

PERMIT # RN-12-091606

PROJECT NAME: John Wieland

ADDRESS: 2004 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2676

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

04/23/2013

PERMIT # RN-12-091604

PROJECT NAME: John Wieland

ADDRESS: 2008 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Home 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Exhibit B

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

07/26/2010

PERMIT #	RN-08-075072
PROJECT NAME:	John Wieland Homes
ADDRESS:	3017 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2003 IRC NEW FLOOD REGS
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2862

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/12/2011

PERMIT #	**RN-10-083723**
PROJECT NAME:	John Wieland
ADDRESS:	2041 Amenity Park Dr
CITY, ST ZIP:	Mt Pleasant, SC 29466
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/22/2011

PERMIT # RN-10-083743

PROJECT NAME: John Wieland Homes

ADDRESS: 2045 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name John Wieland Homes & Neighborhood of Carolinas

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2676

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/05/2009

PERMIT #	**RN-08-075060**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3001 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	**2847**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

C E R T I F I C A T E O F O C C U P A N C Y

03/31/2010

PERMIT #	**RN-08-075062**
PROJECT NAME:	**John Wieland**
ADDRESS:	**3005 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**2652**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/14/2009

PERMIT #	**RN-08-075063**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3009 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas 3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2003 IRC NEW FLOOD REGS
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2652

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/23/2010

PERMIT #	**RN-08-075069**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3013 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29464**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	**R-3 and IRC Residential, one and two family**
OCCUPANCY TYPE:	
SQUARE FOOTAGE:	**3038**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/16/2011

PERMIT #	RN-10-081288
PROJECT NAME:	John Wieland
ADDRESS:	3022 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2750

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/08/2011

PERMIT #	**RN-10-083801**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3025 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC Flood AE 14 + 1
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2966

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/21/2011

PERMIT #	**RN-10-081226**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3026 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3119

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

04/05/2012

PERMIT # RN-10-083902

PROJECT NAME: John Wieland

ADDRESS: 3029 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29464

Contractor's Name John Wieland Homes & Neighborhood of Carolinas

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC Flood Zone AE 14 + 1

PROPOSED USE:
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2705

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/02/2011

PERMIT #	**RN-10-081234**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3030 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3081

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/07/2012

PERMIT # RN-10-083932

PROJECT NAME: John Wieland Homes

ADDRESS: 3033 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name John Wieland Homes & Neighborhood of Carolinas

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC - Flood AE 14 + 1

PROPOSED USE:
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2675

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/15/2011

PERMIT # RN-10-081201

PROJECT NAME: John Wieland Homes

ADDRESS: 3034 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC

Contractor's Name John Wieland Homes & Neighborhood of Carolinas

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/23/2011

PERMIT #	**RN-10-083933**
PROJECT NAME:	**John Wieland**
ADDRESS:	**3037 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of Carolinas**
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC - Flood AE 14 + 1**
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3726

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Exhibit C

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850391 Date: 6/22/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: T0357 ~~53835~~-JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0010
One Hamlin Place
3041 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~23.2000~~ 22	160.000	~~3,712.00~~ 3740.00
scbaywnddbl	double bay window	each	1.0000	500.000	~~500.00~~ 500.00
sccrown	crown mold & frieze	lf	~~157.0000~~ 593	3.000	~~471.00~~ 1779.00
scfascia	fascia and soffit	lf	~~157.0000~~ 129	7.000	~~1,099.00~~ 903.00

Sub-Total ~~6,782.00~~
Sales Tax 0.00
Total Amt ~~6,782.00~~ 6892.00

Authorized Signature:
By:
Title: DS
Date: 4/23/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
4/12/2013	2304

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 10

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
12	pe	1pediment	70.00	840.00
87	ba	1installband	6.00	522.00
22	s	1sidingtrim	170.00	3,740.00
129	c	1fascia	7.00	903.00
129	fr	frieze	3.00	387.00
1	bay	1baydouble	500.00	500.00

Geoff Bristol

Total $6,892.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850840 Date: 6/25/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: s3835-JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0011
One Hamlin Place
3045 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~12.7000~~ 16	160.000	~~2,032.00~~	2720.00
sccrown	crown mold & frieze	lf	60 ~~92.0000~~ 76	3.000	~~276.00~~	180.00
scfascia	fascia and soffit	lf	~~92.0000~~ 26	7.000	~~644.00~~	182.00

Sub-Total ~~2,952.00~~
Sales Tax 0.00
Total Amt ~~2,952.00~~ 3082.00

Authorized Signature:
By: [signature]
Title: ACG
Date: 7/12/12

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By: [signature]
Title: PAYMENT APPROVED BY ADAM JOHNSON VP CONSTRUCTION-CHS
Date:

Close

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
4/12/2013	2305

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 11

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
16	s	1sidingtrim	170.00	2,720.00
26	c	1fascia	7.00	182.00
26	fr	frieze	3.00	78.00
17	ba	1installband	6.00	102.00

Geoff Bristol

Total $3,082.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850886 Date: 6/25/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

t0357

To: ~~s3835~~ JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0012
One Hamlin Place
3049 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 720

Resource/Use Description		Unit	Quantity	Price	Extension
0NOTEALIST	PO is for entire scope of work. VPOs will not be accepted	note	0.1400	0.000	0.00
1sidingtrim	Install all siding includes PT band	sqr	~~23.2000~~ 22	160.000	~~2,712.00~~ 3740.00
scbaywnddbl	double bay window	each	1.0000	500.000	500.00 ✓
sccrown	crown mold & frieze	lf	~~157.0000~~ 662	3.000	~~471.00~~ 1986.00
scfascia	fascia and soffit	lf	~~157.0000~~ 133	7.000	~~1,099.00~~ 931.00

board & batt.

Sub-Total	~~5,782.00~~
Sales Tax	0.00
Total Amt	~~5,782.00~~ 6657.00

PAYMENT ... CONSTRUC...

Authorized Signature:
By: [signature]
Title: ASR
Date: 5/15/13

Vendor\Sub-Contractor:
By: [signature]
Title:
Date:

Approved For Payment:
By: [signature]
Title:
Date:

Close

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
4/12/2013	2306

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 12

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
22	s	1sidingtrim	170.00	3,740.00
133	c	1fascia	7.00	931.00
133	fr	frieze	3.00	399.00
88	ba	1installband	6.00	528.00
8	pe	1pediment	70.00	560.00
1	bay	1baydouble	500.00	500.00

Geoff Bristol

Total $6,651.00

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846465 Date: 6/11/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

t0357
To: ~~c3835~~-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0032
One Hamlin Place
2000 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Forsythia1

Will Call To Verify Ship Date.

Est Date Required:

Superintendent: ADAM ANDERSON

F.O.B.:

Payment Terms: Weekly Trades

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	0 ~~[illegible]~~	~~[illegible]~~	~~4,240.00~~
sccrown	crown mold & frieze	lf	287 ~~[illegible]~~	3.000	~~831.00~~ 8613.00
scfascia	fascia and soffit	lf	0 ~~[illegible]~~	7.000	~~1,939.00~~
	board board and batten gable/double dormer				

~~Sub-Total 7,010.00~~
~~Sales Tax 0.00~~
Total Amt ~~7,010.00~~ 8613.00

Authorized Signature:
By: [signature]
Title: [illegible]
Date: 1/24/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

.MC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Invoice

Date	Invoice #
1/20/2013	2210

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 32

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
27.5	s	1sidingtrim	170.00	4,675.00
207	c	1fascia	7.00	1,449.00
207	fr	frieze	3.00	621.00
78	ba	1installband	6.00	468.00
10	pe	1pediment	70.00	700.00
1	bay	1baydouble	500.00	500.00
1	dor	1dormer	200.00	200.00

Geoff Bristol

Total $8,613.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846467 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0032
One Hamlin Place
2000 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~30.0000~~ 34	35.000	~~1,050.00~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,190.00~~
Sales Tax 0.00
Total Amt ~~1,190.00~~ 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By: ADAM C ANDERSON
Title: CONSTRUCTION MANAGER
Date:
PAYMENT APPROVED BY

Close

JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Invoice

Date	Invoice #
10/7/2012	2045

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 32 2000 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00
			Total	$1,390.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846547 Date: 6/11/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

t0357

To: ~~s3835~~ JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0033
One Hamlin Place
2004 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~25.6000~~ 0	~~16.000~~	~~2,176.00~~
sccrown	crown mold & frieze	lf	1840 ~~1,840.00~~	3.000	~~609.00~~ $520.00
scfascia	fascia and soffit	lf	0 ~~2,[illegible].0000~~	7.000	~~1,421.00~~
	Remainder boardboard doorman		120 N		

~~Sub Total 4,206.00~~
~~Sales Tax 0.00~~
Total Amt ~~4,206.00~~ 5520.00

Authorized Signature:
By: [signature]
Title: OCB
Date: 1/21/13

Vendor\Sub-Contractor:
By: [signature]
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

Invoice

onstruction, LLC

16 Meeting St.
North Charleston, SC 29405

Date	Invoice #
1/20/2013	2211

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 33

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
14	s	1sidingtrim	170.00	2,380.00
212	e	1fascia	7.00	1,484.00
212	fr	frieze	3.00	636.00
1	dor	1dormer	200.00	200.00
10	pe	1pediment	70.00	700.00
20	ba	1installband	6.00	120.00

Geoff Bristol

Total $5,520.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846549 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0033
One Hamlin Place
2004 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~31.0000~~ 34	35.000	~~1,085.00~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,225.00~~
Sales Tax 0.00
Total Amt ~~1,225.00~~ 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By:
Title: ADAM C ANDERSON
Date:

PAYMENT APPROVED BY
CONSTRUCTION MANAGER
Close

JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Invoice

Date	Invoice #
10/7/2012	2046

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 33 2004 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00

Total $1,390.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02893733 Date: 12/5/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: ~~3835~~ 10357 JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0034
One Hamlin Place
2008 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: GEOFF BRISTOL

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~0~~	170.000	~~4,335.00~~
sccrown	crown mold & frieze	lf	~~287~~	3.000	~~831.00~~
scfascia	fascia and soffit	l	~~0~~	7.000	~~1,939.00~~

~~Sub-Total 7,105.00~~
~~Sales Tax 0.00~~
Total Amt ~~7,105.00~~ 8613.00

8613.00

Authorized Signature:
By:
Title:
Date: 1/21/13

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
1/20/2013	2212

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 34

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
27.5	s	1sidingtrim	170.00	4,675.00
207	c	1fascia	7.00	1,449.00
207	fr	frieze	3.00	621.00
10	pe	1pediment	70.00	700.00
1	bay	1baydouble	500.00	500.00
1	dor	1dormer	200.00	200.00
78	ba	1installband	6.00	468.00

Geoff Bristol

Total $8,613.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846513 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0034
One Hamlin Place
2008 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~30.1000~~ 34	35.000	~~1,053.50~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,193.50~~
Sales Tax 0.00
Total Amt ~~1,193.50~~ 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
PAYMENT APPROVED BY
ADAM C ANDERSON
CONSTRUCTION MANAGER
Title:
Date:

Close

Invoice

JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Date	Invoice #
10/7/2012	2047

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 34 2008 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00
			Total	$1,390.00

Exhibit D

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiffs vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 AFFIDAVIT OF JT MCMICKLE

PERSONALLY APPEARED before me, JT McMickle who, being first duly sworn, deposes and says:

1. I am over 18 years of age and otherwise competent to provide this affidavit and the testimony herein.

2. I served as Chief Financial Officer for RP Falcon Properties, LLC f/k/a JW Homes, LLC ("JW Homes") during the time of construction of Buildings 5 through 11 of

the One Hamlin Townhome project (hereinafter collectively referred to, for convenience and purposes of this affidavit only, as "One Hamlin Phase II").

3. That JW Homes did not self-perform work at One Hamlin Phase II.

4. That subcontractors were paid to perform the work at One Hamlin Phase II.

5. I have personal knowledge of the business records of JW Homes.

6. That the purchase orders and invoices produced by JW Homes are part of the business records of JW Homes.

7. That the purchase orders and invoices produced by JW Homes in this case are kept in the regular course of JW Homes' business.

8. That it was the regular practice of JW Homes to create the purchase orders invoices at or about the time the work described on the purchase orders or invoices was performed.

9. That based on my review of the business records of JW Homes for One Hamlin Phase II, All Exteriors Construction, LLC ("All Exteriors") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5, 7, 8, 9, 10, and 11, including the siding installation at buildings 7-11 of One Hamlin Phase II.

10. That based on my review of the business records of JW Homes for One Hamlin Phase II, Jorge Medina, And Jorge Medina A/K/A JMC Construction, LLC A/K/A JMC Construction, Inc.'s ("JMC") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5 and 6 of One Hamlin Phase II, including the installation of the siding at Buildings 5 and 6.

Further, AFFIANT SAYETH NOT.

(Signature page to follow)

JT McMickle

The forgoing statement was sworn to and
Acknowledged before me this 14
Day of April 2022

Notary Public for Utah
My Commission expires: 5/10/23

NOTARY PUBLIC
JOSIE A HAGEN
COMM. # 706267
COMMISSION EXPIRES
MAY 10, 2023
STATE OF UTAH

Exhibit E

Myles Glick Architect LLC
66 Rebellion Road, Charleston, SC
29407
mylesglickarchitectllc@live.com

March 8, 2018

Myles Glick, AIA LEED AP
Myles Glick Architect LLC
66 Rebellion Road
Charleston, South Carolina 29407

Mr. John C. Hayes IV
180 Meeting Street
Suite 305
Charleston, South Carolina 29401

Mr. I. Keith McCarty
McCarty Law Firm
1212 Wappoo Road
P.O. Box 30055
Charleston, South Carolina 29417

Re: Preliminary Report (Non Destructive and Destructive Review)
One Hamlin Place
Hamlin Plantation
Mt. Pleasant, South Carolina

In accordance with the request of the homeowners, the following report is presented to the One Hamlin Place Condominium Association for their review and use.

This report contains the results of the non-destructive reviews and the destructive testing. The non-destructive reviews took place on May 13, 2015, July10, 2015 and August 14, 2017. Additional destructive and additional non-destructive reviews took place on November 2,3, 2017. The exterior of the complex and the interior of one unit (#3013 Mohegan Way) was investigated on August 14, 2017. Nineteen (19) destructive test holes/areas of investigation were made on November 2, 2017 and twenty three (23) test holes on November 3, 2017 with additional interior reviews taking place (units #3077,#2044, #3001, #2020 and #2044).

This report is not a complete analysis of **a**ll building systems (mechanical, electrical, plumbing and structural) but rather a specific review of the building skin (walls) and roof/flashing systems. The review is focused on construction deficiencies that have resulted in water intrusion and building component failure. Additional construction

4. At the paneled walls, head flashing immediately above windows is not present and all sealant joints at window/trim intersections do not have the proper gap for a backer rod and sealant joint.
5. The windows are by YKK ap and are double flange single hung solid vinyl windows that do not allow for a proper engineered caulk joint at all trim intersections.
6. Most window and door head flashing is caulked shut.
7. Kick out flashing is missing at appropriate areas

B. Cementitious Siding

The Building Code allows alternative products to be used if they pass a compliance test by a third party testing agency. The cementitious product used at One Hamlin Place is primarily a product by Hardi Plank. In accordance with NER #409, Hardi Plank has been approved for use if it is installed in accordance with the manufacture's installation instructions. If it is not installed in accordance with the manufacture's installation instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-identified at this time. Installation requirements and therefore, construction deficiencies would be the same as Hardie Plank.

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2” ring shank hot dipped galvanized siding nail with a 0.22” nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

References to Hardie Plank are to all cementitious materials in this report. The 2008/09/12 Hardie Plank installation Instructions were published and available. Therefore they would apply to the installation of the Hardie Plank siding at One Hamlin Place. Common to all installation instructions are the following.

1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

C. Windows

After investigating all eleven buildings, it was determined that all windows are solid vinyl single hung with a DP of 50. They are not impact resistant windows. The

Exhibit F

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME I

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Friday, March 8, 2019

TIME: 10:07 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

* * * * * * * * * * * * * * * * *

Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

A. Pull out capacity.

Q. Gotcha. What is the other issue?

A. And then the spacing between the -- is more than 16 inches, and these studs are 16 inches on this building. And then all the pictures surrounding it illustrate the same thing. It's a long board. And then 21 actually is the HardiePlank label, so it is HardiePlank. 22, it's nailed too close to the butt joint. And almost on an inch; it's 7/8ths. So it's fairly close, but it's just too close to the edge. It should be an inch. It's 3/8ths. There's just not a holding power of the board left.

Q. Let me direct your attention to 32. We're now back to building 1. I think we talked earlier in the deposition that here the water intrusion that you can document with the -- is that -- in 32 and 33, am I seeing sealant splitting, or is that something else I'm looking at?

A. No, you're right. That's the sealant splitting. This is the end unit. I believe this window we're looking at is over the brick facade, which kind of goes up a little bit. This is the unit that Andrew was referring to. But you're

Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME II

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Monday, March 11, 2019

TIME: 9:15 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

* * * * * * * * * * * * * * * * *

Electronically signed by Eve Wilbanks (101-177-349-6970) 2caf5fd7-7266-43f7-9313-090df8197876

interpreting that; you're going to adopt what Russ says about that?

A. Yes, I'll defer to Russ. It's a structural issue.

Q. But your opinion is that the siding needs to be replaced?

A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Q. You were asked some questions and shown photographs of the -- I think it's been described as the white panels that were installed typically on the rear of the buildings with the flat roofs, correct?

A. Correct. They were also on bay windows on the sides, and they're also on the siding when some of the back areas turned the corner, as we saw on that very first unit. When you go in the project, with the brick facade, there's at least 12 feet of those panels that wrap the corner.

Q. Are any of those panel constructions on buildings 2, 4 or 6, which are the buildings with the sloped roofs?

A. I would have to go back and see if there's any bay windows on there.

Electronically signed by Eve Wilbanks (101-177-349-6970) 2caf5fd7-7266-43f7-9313-090df8197876

Exhibit G

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,	)	
Plaintiff,	)	
-versus-	)	Case No.: 2017-CP-10-5245
JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., et al.,	)	
Defendants.	)	

THE DEPOSITION OF RUSSELL T. MEASE was taken as a witness on behalf of the Defendants, pursuant to South Carolina Rules of Civil Procedure, at 10:00 a.m. on Thursday, the 14th day of March 2019, at the offices of Robertson Hollingsworth Manos & Rahn, 550 King Street, Suite 300, Charleston, South Carolina, before Janice O. Darby, Registered Professional Reporter and Notary Public in and for the State of South Carolina.

Janice Ohlendorf Darby, RPR
(843) 814-7666 jodarby@comcast.net

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

Q I understand. Just because other contractors may have done it in the community doesn't make it so, and you wouldn't rely on what other contractors may have done to support a opinion to a reasonable degree of engineering certainty as to what the contractors did in this case. Correct?

A True. But I'm relying on Mr. Glick and his evaluation of the property and him relaying to me that they were the typical nail that was used.

Q I understand. So again, the basis of your opinion that the fasteners used at all 11 buildings on this project on the HardiePlank were improper is based on six nails we see in DT 33 and photo 72 of Exhibit 36 and that Mr. Glick, the other primary expert in this case that did the investigation, told you that that's what he saw as being out on the project?

A Correct.

Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

used?

A Yes. That's the second part of item two under Recommendations where I document that condition.

Q So you note, "The use of improper fasteners will negatively affect the ability of the siding to resist wind loading."

A Yes. Mr. Glick gave other reasons also for needing to remove the siding, but mine is a supporting element to that recommendation.

Q And we talked about the fasteners used, and I know this is probably an over-generalization. But when we looked at that chart, assuming Mr. Glick was accurate and we do have the siding nails out there instead of the roofing nails, those generally are only sufficient up to about 80 miles an hour is what that chart told us?

A I think it was 70 at a 40-foot height, but yes.

Q I don't know that it matters, but just to make sure that I'm accurate as to what I was looking at, if we go back to page 27 of NER 405.

A Yes. A 40-foot height is 70 miles an hour.

Q Are there any other components or

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

ELECTRONICALLY FILED - 2022 Apr 14 2:44 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiffs vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 RP FALCON PROPERTIES, LLC F/K/A JW HOMES, LLC, RP FALCON LAND, LLC, F/K/A JW LAND INVESTMENT, LLC, RP FALCON REALTY, LLC, F/K/A WIELAND REALTY, LLC, AND RESIDENTIAL PARTNERS, LLC MEMORANDUM IN OPPOSITION TO ALL EXTERIORS CONSTRUCTION, LLC'S MOTION FOR SUMMARY JUDGMENT

RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as the "RP Companies") hereby submit this memorandum in opposition to Defendant All Exteriors Construction, LLC's ("All Exteriors") Motion for Summary Judgment.

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Introduction

This is a motion for summary judgment by a subcontractor against a general contractor on the general contractor's claims for equitable indemnity. This motion should be denied as under South Carolina law a general contractor is not automatically liable for the negligence of its subcontractors. See Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80,89 (2008). Instead, whether, and to what extent a general contractor is liable for the negligence of its subcontractors is a question for the fact-finder to determine. Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

Background

This is a construction defect action arising out of the construction of 11 townhomes known as One Hamlin Place ("One Hamlin"). RP Falcon Properties, LLC F/K/A JW Homes, LLC ("JW Homes") served as the general contractor for buildings 5 through 11 at One Hamlin Place (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as "One Hamlin Phase II"). The Certificates of Occupancy ("CO") for One Hamlin Phase II were issued between April 23, 2013 and November 25, 2014 and identify JW Homes or JW Homes LLC as the contractor. See Exhibit A. The COs for Buildings 1 through 4 of One Hamlin were issued between August 5, 2009 and April 5, 2012 and identify John Wieland Homes & Neighborhood of the Carolinas as the contractor. See Exhibit B.

Plaintiffs filed this action against the RP Companies[1], among others, alleging deficiencies in the construction of the townhomes at One Hamlin. The RP Companies

[1] Plaintiffs alleges a theory of amalgamation against JW Homes and other entities, including the RP Companies, relating to a series of transactions that occurred between 2009 through 2012. Plaintiffs claim that these entities and a number of others are amalgamated and that for purposes of any judgment that may be rendered in favor of the Plaintiff, these entities should be treated as a single

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answered the Plaintiffs' complaint denying liability and filing cross-claims and a third-party complaint seeking indemnity from various subcontractors who performed the work at One Hamlin Phase II, alleging that these subcontractors must identify the RP Companies if and to the extent that the RP Companies are found liable to Plaintiffs for damages relating to the subcontractors' work. All Exteriors was a subcontractor who performed work at buildings 5 and 7 through 11 at One Hamlin Phase II and has moved for summary judgment as to the RP Companies' claims. See purchase orders and invoices reflecting work performed by All Exteriors ("Exhibit C") and All Exteriors' Memorandum in Support at page 5. This motion should be denied as All Exteriors cannot establish that the undisputed facts show that All Exteriors is entitled to judgment against the RP Companies as a matter of law.

Argument

I. All Exteriors is not Entitled to Summary Judgment on the RP Companies' claim for Indemnity.

Genuine issues of material fact exists as to whether, and to what extent, the RP Companies are entitled to recover indemnity from All Exteriors for All Exteriors' work at One Hamlin Phase II. JW Homes did not self-perform the construction at One Hamlin Phase II. See Affidavit of JT McMickle ("Exhibit D"). Instead it paid subcontractors, such as All Exteriors, to perform the construction, including the work at One Hamlin Phase II claimed to be deficient in this suit. Id. and Exhibit C. While the RP Companies deny Plaintiffs' claims, Plaintiffs seek damages from the RP Companies for All Exteriors' work at One Hamlin Phase II. All Exteriors installed the siding at Buildings 5, 7, 8, 9, 10 and

business enterprise. Therefore, while RP Falcon Properties, LLC F/K/A JW Homes, LLC was the general contractor for One Hamlin Phase II, for the purposes of this motion, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (the "RP Companies") are each entitled to indemnity to the extent that Plaintiffs prove they are amalgamated.

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11. See Exhibit C and All Exteriors' Memorandum in Support at page 5. Plaintiffs contend there are deficiencies with the installation of the siding at those buildings.[2] Specifically, Plaintiffs' experts claim as defective and call for the complete removal and replacement of the siding installed by All Exteriors:

instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2" ring shank hot dipped galvanized siding nail with a 0.22" nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

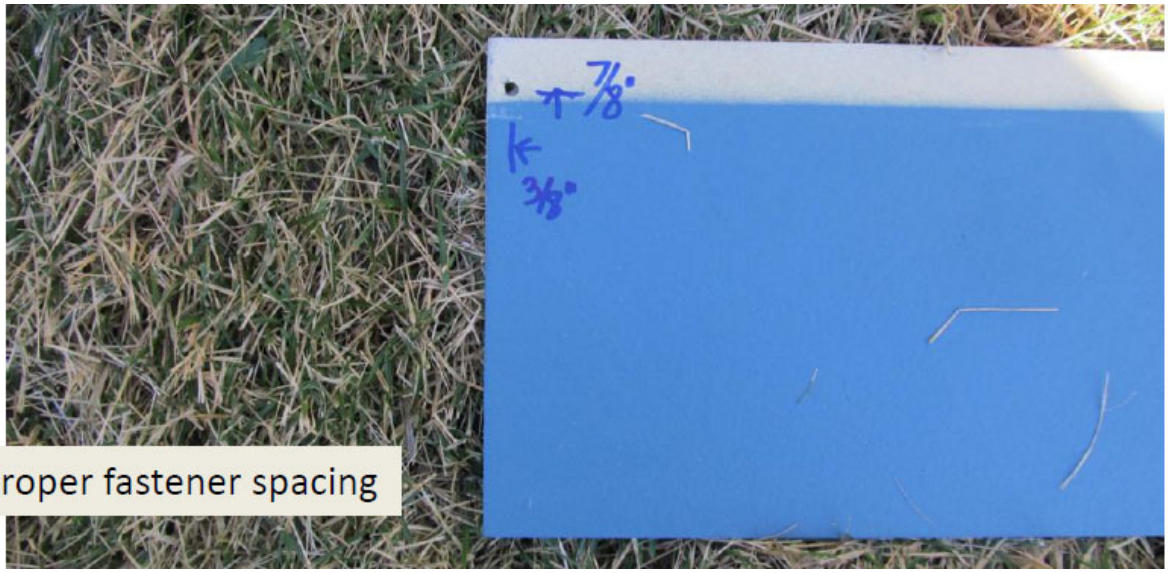
1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

Excerpts from the report of Myles Glick, AIA, dated March 8, 2018 at page 3. (Exhibit E)

[2] To survive summary judgment, the RP Companies need only show that at least some of All Exteriors' work at One Hamlin Phase II is complained-of. For the sake of expediency and economy of briefing this memo does not purport to include a full listing of All Exteriors' complained-of work at One Hamlin Phase II.

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Q. Gotcha. What is the other issue?
A. And then the spacing between the -- is more than 16 inches, and these studs are 16 inches on this building. And then all the pictures surrounding it illustrate the same thing. It's a long board. And then 21 actually is the HardiePlank label, so it is HardiePlank. 22, it's nailed too close to the butt joint. And almost on an inch; it's 7/8ths. So it's fairly close, but it's just too close to the edge. It should be an inch. It's 3/8ths. There's just not a holding power of the board left.



Improper fastener spacing

Deposition of Myles Glick, AIA dated March 8, 2019, page 135 line 2 – line 13 (Exhibit F) and photo from Myles Glick's file referenced in the above testimony.

Q. But your opinion is that the siding needs to be replaced?
A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Deposition of Myles Glick, AIA dated March 11, 2019, page 268 line 5 – page 268 line 9. (Exhibit F).

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Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

Page 137

used?

A Yes. That's the second part of item two under Recommendations where I document that condition.

Deposition of R. Mease, dated March 14, 2019, page 136 line 19 – page 137 line 4. (Exhibit G)

All Exteriors argues that the RP Companies cannot maintain an equitable indemnity claim against the subcontractors based on the "negligence rule" that prevents joint tortfeasors from recovering from one another under a claim for equitable indemnity. As an initial point, the RP Companies have standing to assert equitable indemnity claims because "[a] general contractor's relationship with its subcontractor in the residential construction context is sufficient to support the general contractor's right of equitable indemnity against the subcontractor." Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

> "To recover damages on its equitable indemnity claim, [the general contractor] must prove the following: (1) [the subcontractor] was at fault in causing [the homeowner's] water intrusion damages; (2) [the general contractor] has no fault for those damages; and (3) [the general contractor] incurred expenses that were necessary to protect its interest in defending against [the homeowner's] claim."

Id.

In Stoneledge, the Court of Appeals held that a general contractor does not necessarily share in the fault of defective work put in place by its subcontractors, and

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therefore, is able to recover from a subcontractor under a claim for equitable indemnity. Id.; See also Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80,89 (2008)(A general contractor is not automatically responsible for the negligence of a subcontractor).

Accordingly, because the RP Companies can prove at trial that they do not necessarily share in the fault of the alleged defective siding installation performed by All Exteriors, genuine issues of material fact exist as to whether, and to what extent, the RP Companies can recover indemnity from All Exteriors. Id.; Exhibit D. This factual dispute will not be resolved until trial when Plaintiffs' claims against the RP Companies, and the RP Companies' indemnity claims against its subcontractors, are heard and resolved.

II. All Exteriors' Motion regarding "disguised indemnity" under Stoneledge should be denied.

All Exteriors argues that the RP Companies' crossclaims for negligence, breach of warranty and breach of contract are not independent causes of action but merely "disguised indemnity claims." All Exteriors' Memorandum in Support at page 8 – 10. The RP Companies do not dispute that, under Stoneledge, its negligence, breach of warranty, and breach of contract causes of action form the substantive basis for its indemnity claim. However, these causes of action are not a veiled indemnity claim because the RP Companies will introduce evidence of the subcontractors' breaches that underpin the indemnity claim. As such, these claim, whether labeled "causes of action" or "basis for indemnity" are valid and should not be dismissed.

Conclusion

All Exteriors' motion for summary judgment should be denied, and the matter of the All Exteriors' potential liability to the RP Companies should be submitted to the jury

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after all the evidence is heard on Plaintiffs' claims against the RP Companies and the RP Companies' claims against All Exteriors.

Respectfully submitted,

PARKER POE ADAMS & BERNSTEIN LLP
200 Meeting Street, Suite 301
Charleston, SC 29401

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And

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Attorneys for Defendants, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC

Exhibit A

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/20/2014

PERMIT # RN-13-097683

PROJECT NAME: JW Homes

ADDRESS: 3061 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

07/26/2013

PERMIT # RN-12-092021

PROJECT NAME: John Wieland

ADDRESS: 3041 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

06/04/2013

PERMIT # RN-12-092020

PROJECT NAME: John Wieland Homes

ADDRESS: 3045 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

06/03/2013

PERMIT # RN-12-092015

PROJECT NAME: John Wieland Homes

ADDRESS: 3049 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/28/2014

PERMIT # RN-13-097682

PROJECT NAME: JW Homes

ADDRESS: 3053 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/20/2014

PERMIT # RN-13-097681

PROJECT NAME: JW Homes

ADDRESS: 3057 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/04/2014

PERMIT # RN-13-099693

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3065 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/16/2014

PERMIT # RN-13-099694

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3069 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/17/2014

PERMIT # RN-13-099696

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3073 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/19/2014

PERMIT # RN-13-099702

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3077 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/25/2014

PERMIT # RN-14-103063

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3081 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/25/2014

PERMIT # RN-14-103066

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3085 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Townhome
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/24/2014

PERMIT # RN-14-103071

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3089 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/24/2014

PERMIT # RN-14-103072

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3093 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/02/2014

PERMIT # RN-13-101762

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2032 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/15/2014

PERMIT # RN-13-101734

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2036 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification



T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/29/2014

PERMIT # RN-13-101728

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2040 Amenity Park Dr.
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/09/2014

PERMIT # RN-13-101727

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2044 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Townhome
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/19/2014

PERMIT # RN-13-096959

PROJECT NAME: JW Homes

ADDRESS: 2016 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/11/2014

PERMIT # RN-13-096939

PROJECT NAME: JW Homes

ADDRESS: 2020 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/22/2014

PERMIT # RN-13-096936

PROJECT NAME: JW Homes

ADDRESS: 2024 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

12/19/2013

PERMIT # RN-13-096932

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502
Mt Pleasant

PROPERTY ADDRESS: 2028 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Single Family Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/17/2013

PERMIT # RN-12-091555

PROJECT NAME: John Wieland

ADDRESS: 2000 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Dwelling 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2749

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/23/2013

PERMIT # RN-12-091606

PROJECT NAME: John Wieland

ADDRESS: 2004 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2676

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

04/23/2013

PERMIT # RN-12-091604

PROJECT NAME: John Wieland

ADDRESS: 2008 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Home 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Exhibit B

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

07/26/2010

PERMIT #	RN-08-075072
PROJECT NAME:	John Wieland Homes
ADDRESS:	3017 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2003 IRC NEW FLOOD REGS
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2862

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/12/2011

PERMIT #	**RN-10-083723**
PROJECT NAME:	John Wieland
ADDRESS:	2041 Amenity Park Dr
CITY, ST ZIP:	Mt Pleasant, SC 29466
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/22/2011

PERMIT # RN-10-083743

PROJECT NAME: John Wieland Homes

ADDRESS: 2045 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name John Wieland Homes & Neighborhood of Carolinas

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2676

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/05/2009

PERMIT #	**RN-08-075060**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3001 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	**2847**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/31/2010

PERMIT #	**RN-08-075062**
PROJECT NAME:	**John Wieland**
ADDRESS:	**3005 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**2652**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/14/2009

PERMIT #	RN-08-075063
PROJECT NAME:	John Wieland Homes
ADDRESS:	3009 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas 3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2003 IRC NEW FLOOD REGS
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2652

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

C E R T I F I C A T E O F O C C U P A N C Y

08/23/2010

PERMIT #	**RN-08-075069**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3013 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29464**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	**R-3 and IRC Residential, one and two family**
OCCUPANCY TYPE:	
SQUARE FOOTAGE:	**3038**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/16/2011

PERMIT #	RN-10-081288
PROJECT NAME:	John Wieland
ADDRESS:	3022 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2750

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/08/2011

PERMIT #	**RN-10-083801**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3025 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC Flood AE 14 + 1**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**2966**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/21/2011

PERMIT #	**RN-10-081226**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3026 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3119

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

04/05/2012

PERMIT # RN-10-083902

PROJECT NAME: John Wieland

ADDRESS: 3029 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29464

Contractor's Name John Wieland Homes & Neighborhood of Carolinas

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC Flood Zone AE 14 + 1

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2705

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/02/2011

PERMIT #	**RN-10-081234**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3030 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3081

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/07/2012

PERMIT #	**RN-10-083932**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3033 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29466**
Contractor's Name	**John Wieland Homes & Neighborhood of Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC - Flood AE 14 + 1**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**2675**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/15/2011

PERMIT # RN-10-081201

PROJECT NAME: John Wieland Homes

ADDRESS: 3034 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC

Contractor's Name John Wieland Homes & Neighborhood of Carolinas

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/23/2011

PERMIT #	**RN-10-083933**
PROJECT NAME:	**John Wieland**
ADDRESS:	**3037 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of Carolinas**
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC - Flood AE 14 + 1**
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3726

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

Exhibit C

RECEIVED
FEB 03 2014
JW HOMES, LLC

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02967961 Date: 9/19/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0014
One Hamlin Place
3057 Monhegan Way
Mt. Pleasant SC 29464

Reverse Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~12.7000~~ 11.5	170.000	~~2,159.00~~	3335.00
sccrown	crown mold & frieze	lf	~~92.0000~~ 90	6.500	~~598.00~~	585.00
scfascia	fascia and soffit	lf	~~92.0000~~ 90	8.500	~~782.00~~	765.00
scpedimentbi	pediment build & install	each	~~0.0000~~ 2	70.000	~~0.00~~	140.00

Sub-Total ~~3,559.00~~
Sales Tax 0.00
Total Amt ~~3,539.00~~ 4825.00

Authorized Signature:
By:
Title:
Date:

PAYMENT APPROVED BY
DOUG PILCHER
ASSOC. SIG. BUILDER

Vendor\Sub-Contractor:
By:
Title:
Date: 1/20/14

Approved For Payment:
By: PAYMENT APPROVED BY
Title: SCOTT PARKER
Date: CONSTRUCTION MANAGER

[redacted]

PAYMENT APPROVED BY
JAMES HUFFMAN
VP CONST CHARLESTON

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95135617

Vendor/Trade Partner: all Ext, llc		Neighborhood/Lot/Block: OHPT one hamlin place #14	
Vendor Number: (Must have vendor number for payment) +0795		Activity Number: (Only one activity number per VPO) 33700	Activity Description:
Vendor/Trade Partner Phone Number:	Date: 1/20/14	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
Work per invoice 187	x $	=	3290.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST-CHARLESTON

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

dawg

Subtotal: X

Sales Tax:

ELIMINATE THE VARIANCE!

VPO Total Amount: $ 3290.00

Builder Signature: PAYMENT APPROVED BY DOUG PILCHER ASSOC. SIG. BUILDER

by: _____

Vendor/Trade Partner Signature:

by: _____

Neighborhood Manager: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER

by: _____

Distribution: White – Accounting Yellow – Trade Partner

321090213

JOHN WIELAND HOMES
AND NEIGHBORHOODS

RECEIVED
FEB 03 2014
JW HOMES, LLC

MEASUREMENT PURCHASE ORDER

Number: 02967974 Date: 9/19/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0015
One Hamlin Place
3061 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: FORREST CHIP COOPER JR

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
0NOTEALIST	PO is for entire scope of work. VPOs will not be accepted	note	0.0000	0.000	0.00
1sidingtrim	Install all siding includes PT band	sqr	~~28.0000~~ 28	170.000	~~4,760.00~~ 6380.00
scbaywnddbl	double bay window	each	1.0000	500.000	500.00 ✓
sccrown	crown mold & frieze	lf	~~157.0000~~ 152	6.500	~~1,020.50~~ 988.00
scfascia	fascia and soffit	lf	~~157.0000~~ 152	8.500	~~1,334.50~~ 1292.00
scpedimentbl	pediment build & install	each	~~0.0000~~	70.000	~~0.00~~ 840.00

Sub-Total	~~7,514.50~~
Sales Tax	0.00
Total Amt	~~7,613.00~~ 10,000.00

PAYMENT APPROVED BY JAMES HUFFMAN VP COLLY-CHARLESTON

Authorized Signature:
By: PAYMENT APPROVED BY DOUG FLETCHER
Title: ASSOC. VIC. BUILDER
Date: 1/7

Vendor\Sub-Contractor:
By:
Title:
Date: 1/20/14

Approved For Payment:
By:
Title: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER
Date:

Close

John Wieland Homes
JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order 95135615

Vendor/Trade Partner:		Neighborhood/Lot/Block: OHP-T
all Ext., LLC		one hamlin place #15
Vendor Number: (Must have vendor number for payment)		Activity Number: (Only one activity number per VPO)
+0795		~~33~~ 33700
Vendor/Trade Partner Phone Number:	Date: 1/20/14	Original Budget:
		Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 188	x $	=	3150.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

dsw g

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST CHARLESTON

Subtotal:

Sales Tax: X

ELIMINATE THE VARIANCE!

VPO Total Amount: $ 3150.00

Builder Signature: PAYMENT APPROVED BY DOUG PRICHER ASSOC SIG BUILDER
by: _____

Vendor/Trade Partner Signature:
by: _____

Neighborhood Manager:
by: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER

Distribution: White – Accounting Yellow – Trade Partner

321090213

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
1/20/2014	188

Bill To

JW HOMES, LLC
CHARLESTON DIVISION
P.O. BOX 87514
Atlanta, GA 30337

Ship To

one hamlin place
unit # 15
monhegan way

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
02967974			1/20/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
22	ns	siding	290.00	6,380.00
152	ch	cornice/hardi	8.50	1,292.00
152	fr	frieze	6.50	988.00
100	ba	bandboard	6.00	600.00
12	ped	pediments	70.00	840.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00
1	bd	bay/double	500.00	500.00

Total $13,150.00

RECEIVED
APR 28 2014
JW HOMES, LLC

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS

P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order 95134542

Vendor/Trade Partner:		Neighborhood/Lot/Block:	
all ext. llc		OHP-T Hermegan way one hamlin place unit 16	
Vendor Number: (Must have vendor number for payment) t0795		Activity Number: (Only one activity number per VPO) 33100	Activity Description:
Vendor/Trade Partner Phone Number:	Date: 4/29/14	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 306	x $	=	13,155.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

chip

Subtotal: X

Sales Tax:

ELIMINATE THE VARIANCE!

PAYMENT APPROVED BY
JAMES PARTIN
VP CONST. CHARLOTTE
VPO Total Amount: $ 13,155.00

Builder Signature:

PAYMENT APPROVED BY
CHRIS COBB
SIGNATURE BUILDER

by: _____

Vendor/Trade Partner Signature:

by: _____

Neighborhood Manager:

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

by: _____

Distribution: White – Accounting Yellow – Trade Partner

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
4/28/2014	306

Bill To

JW HOMES, LLC
CHARLESTON DIVISION
P.O. BOX 87514
Atlanta, GA 30337

Ship To

one hamlin place
unit # 16

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134542			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
25	ns	siding	290.00	7,250.00
135	ch	cornice/hardi	8.50	1,147.50
135	fr	frieze	6.50	877.50
13	ped	pediments	70.00	910.00
70	ba	bandboard	6.00	420.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $13,155.00

Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
4/28/2014	307

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 17

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134543			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
18	ns	siding	290.00	5,220.00
85	ch	cornice/hardi	8.50	722.50
85	fr	frieze	6.50	552.50
40	ba	bandboard	6.00	240.00
2	ped	pediments	70.00	140.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $9,925.00

Invoice

xteriors Construction LLC
4116 meeting st
SC 29405

Date	Invoice #
4/28/2014	308

Bill To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337

Ship To
one hamlin place unit # 18

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134544			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
17	ns	siding	290.00	4,930.00
70	ch	cornice/hardi	8.50	595.00
70	fr	frieze	6.50	455.00
20	ba	bandboard	6.00	120.00
7	ped	pediments	70.00	490.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,140.00

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95134593

Vendor/Trade Partner:		Neighborhood/Lot/Block:	
all EXT, LLC		OHP unit 19	3074 Monegan way
Vendor Number: (Must have vendor number for payment) t0795		Activity Number: (Only one activity number per VPO) 33450	Activity Description:
Vendor/Trade Partner Phone Number:	Date:	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 371	x $	=	14,517.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

doug

ELIMINATE THE VARIANCE!

Subtotal:

Sales Tax: X

VPO Total Amount: $ 14,517.00

Builder Signature:
PAYMENT APPROVED BY
DOUG PILCHER
SIGNATURE BUILDER
by: _____

Vendor/Trade Partner Signature:
by: _____

Neighborhood Manager:
PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER
by: _____

Distribution: White – Accounting Yellow – Trade Partner

321090213

...riors Construction LLC
...6 meeting st
...SC 29405

Invoice

Date	Invoice #
7/22/2014	371

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 19

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134593			7/22/2014			

Quantity	Item Code	Description	Price Each	Amount
	fp	Front Porch	0.00	0.00
6	np	set post	35.00	210.00
40	sh	standard handrails	18.00	720.00
0.36	c/s	ceiling soffit	275.00	99.00
16	wr	wrap porch beam	28.00	448.00
16	hb	porch hardi trim bandboard	7.00	112.00
28	l	landing	6.50	182.00
16	vl	large vents	260.00	4,160.00
1	a66	a/c stand	325.00	325.00
2	nc	set columns	75.00	150.00
10	s35	stairs 3 ' - 5'	50.00	500.00
	BP	Back Porch	0.00	0.00
42	sh	standard handrails	18.00	756.00
5.04	c/s	ceiling soffit	275.00	1,386.00
90	bac	back porch beam	16.00	1,440.00
10	66	6 x 6 laminated box column	110.00	1,100.00
21	hb	porch hardi trim bandboard	7.00	147.00
	GP	Garage Porch	0.00	0.00
1	np	set post	35.00	35.00
4	sh	standard handrails	18.00	72.00
1	a66	a/c stand	325.00	325.00
11	s35	stairs 3 ' - 5'	50.00	550.00
1	gdtio	garage door trim	180.00	180.00
24	wsb	wrap steel beam W/hardi stucco panels	25.00	600.00
1	fgdo	frame garage door opening	270.00	270.00
1	14gl	add 1 x 4 tky @ garage level	750.00	750.00

Total $14,517.00

RECEIVED
APR 29 2014
JW HOMES, LLC

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95134545

Vendor/Trade Partner: all ext., llc		Neighborhood/Lot/Block: OHP-T 19 one hamlin place unit 19	
Vendor Number: (Must have vendor number for payment) t0795		Activity Number: (Only one activity number per VPO) 33700	Activity Description:
Vendor/Trade Partner Phone Number:	Date: 4/29/14	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 309	x $	=	14,225.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

Chip

ELIMINATE THE VARIANCE!

PAYMENT APPROVED BY
JAMES HUFFMAN
VP CONST CHARLESTON

Subtotal:	X
Sales Tax:	X
VPO Total Amount:	$ 14,225.00

Builder Signature:
PAYMENT APPROVED BY
CHIP COOPER
by: SIGNATURE ON FILE 4/29/14

Vendor/Trade Partner Signature:
by:

Neighborhood Manager:
PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER
by:

Distribution: White – Accounting Yellow – Trade Partner

[redacted] Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
4/28/2014	309

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 19

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134545			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
26	ns	siding	290.00	7,540.00
155	ch	cornice/hardi	8.50	1,317.50
155	fr	frieze	6.50	1,007.50
90	ba	bandboard	6.00	540.00
11	ped	pediments	70.00	770.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $14,225.00

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	388

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 20

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136100			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
21.86	ns	siding front (6.60 right (13.46 left (0 back (1.8	290.00	6,339.40
133	ncm	metal fascia front (44 right (65 left (0 back (24	8.50	1,130.50
133	ncr	frieze front (44 right (65 left (0 back (24	4.00	532.00
67	ba	bandboard front (0 right (52 left (0 back (15	7.00	469.00
15	ped	pediments front (7 right (8	70.00	1,050.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $12,070.90

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	389

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 21

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136101			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
11.2	ns	siding front (4.60 back (6,6	290.00	3,248.00
84	ncm	metal fascia front (60 back (24	8.50	714.00
84	ncr	frieze front (60 back (24	4.00	336.00
39	ba	bandboard front (24 back (15	7.00	273.00
3	ped	pediments front (3	70.00	210.00
1	bd	bay/double	800.00	800.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $8,131.00

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	390

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 22

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136102			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
13.3	ns	siding front (6.70 back (6.6	290.00	3,857.00
68	ncm	metal fascia front (44 back (24	8.50	578.00
68	ncr	frieze front (44 back (24	4.00	272.00
15	ba	bandboard back (15	7.00	105.00
7	ped	pediments front (7	70.00	490.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $7,852.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964498 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0036
One Hamlin Place
2016
Mt. Pleasant SC 29466

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~22.0000~~ 19.5	170.000	~~3,740.00~~ 3315.00
scbaywnddbl	double bay window	each	~~1.0000~~ 2	500.000	~~500.00~~ 1000.00
sccrown	crown mold & frieze	lf	~~583.0000~~ 150	6.500	~~3,789.50~~ 450.00
scfascia	fascia and soffit	lf	~~129.0000~~ 150	8.500	~~1,096.50~~ 1050.00

Sub-Total ~~9,126.00~~
Sales Tax 0.00
Total Amt ~~9,126.00~~ 5815.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By:_____
Title:_____
Date: 10/23

PAYMENT APPROVED BY
ADAM JOHNSON
CONSTRUCTION LDS

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	110

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 36

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
19.5	s	siding	170.00	3,315.00
150	cm	cornice/metal	7.00	1,050.00
150	cr	crown & frieze	3.00	450.00
87	ba	bandboard	6.00	522.00
11	ped	pediments	70.00	770.00
2	bd	bay/double	500.00	1,000.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,657.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

PURCHASE ORDER

Number: 02964501 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0037
One Hamlin Place
2020
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

Est Date Required:

F.O.B.:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~16.0000~~ 12.5	170.000	~~2,720.00~~	2125.00
sccrown	crown mold & frieze	lf	~~60.0000~~ 69	6.500	~~390.00~~	207.00
scfascia	fascia and soffit	lf	~~26.0000~~ 69	8.500	~~221.00~~	483.00

Sub-Total ~~3,331.00~~
Sales Tax 0.00
Total Amt ~~3,331.00~~ 2815.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By:_____
Title: PAYMENT APPROVED BY ADAM JOHNSON CONSTRUCTION-CMS
Date: 10/3

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	112

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 37

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
12.5	s	siding	170.00	2,125.00
69	cm	cornice/metal	7.00	483.00
69	cr	crown & frieze	3.00	207.00
15	ba	bandboard	6.00	90.00
7	ped	pediments	70.00	490.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $6,445.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964504 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0038
One Hamlin Place
2024
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~22.0000~~ 10.5	170.000	~~3,740.00~~	1785.00
scbaywnddbl	double bay window	each	~~1.0000~~ 2	500.000	~~500.00~~	1000.00
sccrown	crown mold & frieze	lf	~~66.0000~~ 81	6.500	~~429.00~~	243.00
scfascia	fascia and soffit	lf	~~133.0000~~ 81	8.500	~~1,130.50~~	567.00

Sub-Total ~~5,799.50~~
Sales Tax 0.00
Total Amt ~~5,799.50~~ 3595.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:_____

Approved For Payment:
By: M
PAYMENT APPROVED BY
ADAM JOHNSON
Title: WILSONS INSTRUCTION CMS
Date: 10/29

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	113

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 38

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
10.5	s	siding	170.00	1,785.00
81	cm	cornice/metal	7.00	567.00
81	cr	crown & frieze	3.00	243.00
2	bd	bay/double	500.00	1,000.00
36	ba	bandboard	6.00	216.00
3	ped	pediments	70.00	210.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $6,571.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964507 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0039
One Hamlin Place
2028 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

Est Date Required:

F.O.B.:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install alf siding includes PT band	sqr	~~22.0000~~ 21.5	170.000	~~3,740.00~~	3655.00
sccrown	crown mold & frieze	lf	~~583.0000~~ 136	6.500	~~3,789.50~~	408.00
scfascia	fascia and soffit	lf	~~129.0000~~ 136	8.500	~~1,096.50~~	952.00

Sub-Total ~~8,626.00~~
Sales Tax 0.00
Total Amt ~~8,626.00~~ 5015.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By: M
Title: PAYMENT APPROVED BY ... VP CONSTRUCTION-CHS
Date: 10/3

http://homelink.jwhomes.com/OnLinePOs/ViewPO.asp?IO...

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	111

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 39

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
21.5	s	siding	170.00	3,655.00
136	cm	cornice/metal	7.00	952.00
136	cr	crown & frieze	3.00	408.00
67	ba	bandboard	6.00	402.00
14	ped	pediments	70.00	980.00
1	bd	bay/double	500.00	500.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,447.00

Charleston - Construction

MEASUREMENT PURCHASE ORDER

Number: 03088754 Date: 01/30/2015

For: (33700) Siding/Cornice Labor

Plan Details
Willingha1 Willingham (chs)
STANDARD Revised: __/__/____

Lot/Block
/

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON, SC 29405

Ship To: ohp-t/000/0042
One Hamlin Place
2040 Amenity Park Drive
Mt. Pleasant, SC 29464

Group: 720 CO: 000 Contract: CHS
Will Call To Verify Ship Date F.O.B.: Ship Via:
Date Required: 03/05/2014 (Estimated) Payment Terms: Weekly Trades
Superintendent: DOUGLAS PILCHER Phone:

Resource/Use	Description	Unit	Quantity	Price	Extension
1detailwall	Detailed Wall	each	1.0000	1,350.000	1,350.00
1parapet	Parapet Wall	ea	1.0000	1,200.000	1,200.00
1sidingtrim	Install all siding includes PT band	sqr	17.0000	290.000	4,930.00
band board	band board	lf	37.0000	7.000	259.00
scbaydbldet	Double Bay Window Detailed	ea	1.0000	900.000	900.00
crown	crown mold & frieze	lf	94.0000	4.000	376.00
fascia	fascia and soffit	lf	94.0000	8.500	799.00
scpedimentbi	pediment build & install	each	3.0000	70.000	210.00

Sub-Total	10,024.00
Sales Tax	0.00
Total Amt	10,024.00

Authorized Signature:
By: _____
Title: PAYMENT APPROVED BY DOUG PILCHER SIGNATURE BUILDER
Date: _____

Vendor/Sub-Contractor:
By: _____
Title: _____
Date: _____

Approved For Payment:
By: _____
Title: PAYMENT APPROVED BY SCOTT BAKER CONSTRUCTION MANAGER
Date: _____

RECORD ON APPEAL

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
7/22/2014	362

03088754

Bill To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337

Ship To
one hamlin place unit # 42

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134570			7/22/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
17	ns	siding front (740 back (960	290.00	4,930.00
94	cm	cornice/metal front n(70 back (24	8.50	799.00
94	cr	crown & frieze front (70 back (24	4.00	376.00
37	ba	bandboard front (22 back (15	7.00	259.00
3	ped	pediments front (3	70.00	210.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00
1	bd	baywindow double detailed	900.00	900.00

Total $10,024.00

Charleston - Construction

afm

MEASUREMENT PURCHASE ORDER

Number: 03088743 Date: 01/30/2015

For: (33700) Siding/Cornice Labor

Plan Details
Willinghal Willingham (chs)
STANDARD Revised: __/__/____

Lot/Block
/

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON, SC 29405

Ship To: ohp-t/000/0043
One Hamlin Place
2044 Amenity Park Drive
Mt. Pleasant, SC 29464

Group: 720 CO: 000 Contract: CHS
Will Call To Verify Ship Date F.O.B.: Ship Via:
Date Required: 03/05/2014 (Estimated) Payment Terms: Weekly Trades
Superintendent: DOUGLAS PILCHER Phone:

Resource/Use	Description	Unit	Quantity	Price	Extension
1detailwall	Detailed Wall	each	1.0000	1,350.000	1,350.00
1parapet	Parapet Wall	ea	1.0000	1,200.000	1,200.00
1sidingtrim	Install all siding includes PT band	sqr	24.0000	290.000	6,960.00
band board	band board	lf	67.0000	7.000	469.00
sccrown	crown mold & frieze	lf	134.0000	4.000	536.00
scfascia	fascia and soffit	lf	134.0000	8.500	1,139.00
sc edimentbi	pediment build & install	each	15.0000	70.000	1,050.00

Sub-Total	12,704.00
Sales Tax	0.00
Total Amt	12,704.00

Authorized Signature:
By: _____
Title: PAYMENT APPROVED BY DOUG PILCHER SIGNATURE REQ'D
Date: _____

Vendor/Sub-Contractor:
By: _____
Title: _____
Date: _____

Approved For Payment:
By: [illegible] SCOTT PARKER
Title: CONSTRUCTION MANAGER
Date: _____

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
7/22/2014	363

03088743

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 43

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134571			7/22/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
24	ns	siding front (660 right (1380 back (360	290.00	6,960.00
134	cm	cornice/metal front (44 right (66 back (24	8.50	1,139.00
134	cr	crown & frieze front (44 right (66 back (24	4.00	536.00
67	ba	bandboard right (52 back (15	7.00	469.00
15	ped	pediments front (7 right (8	70.00	1,050.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Nothing paid to 33700- siding

Total $12,704.00

Exhibit D

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiffs vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 AFFIDAVIT OF JT MCMICKLE

PERSONALLY APPEARED before me, JT McMickle who, being first duly sworn, deposes and says:

1. I am over 18 years of age and otherwise competent to provide this affidavit and the testimony herein.

2. I served as Chief Financial Officer for RP Falcon Properties, LLC f/k/a JW Homes, LLC ("JW Homes") during the time of construction of Buildings 5 through 11 of

the One Hamlin Townhome project (hereinafter collectively referred to, for convenience and purposes of this affidavit only, as "One Hamlin Phase II").

3. That JW Homes did not self-perform work at One Hamlin Phase II.

4. That subcontractors were paid to perform the work at One Hamlin Phase II.

5. I have personal knowledge of the business records of JW Homes.

6. That the purchase orders and invoices produced by JW Homes are part of the business records of JW Homes.

7. That the purchase orders and invoices produced by JW Homes in this case are kept in the regular course of JW Homes' business.

8. That it was the regular practice of JW Homes to create the purchase orders invoices at or about the time the work described on the purchase orders or invoices was performed.

9. That based on my review of the business records of JW Homes for One Hamlin Phase II, All Exteriors Construction, LLC ("All Exteriors") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5, 7, 8, 9, 10, and 11, including the siding installation at buildings 7-11 of One Hamlin Phase II.

10. That based on my review of the business records of JW Homes for One Hamlin Phase II, Jorge Medina, And Jorge Medina A/K/A JMC Construction, LLC A/K/A JMC Construction, Inc.'s ("JMC") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5 and 6 of One Hamlin Phase II, including the installation of the siding at Buildings 5 and 6.

Further, AFFIANT SAYETH NOT.

(Signature page to follow)

JT McMickle

The forgoing statement was sworn to and
Acknowledged before me this 14
Day of April 2022

Notary Public for Utah
My Commission expires: 5/10/23

NOTARY PUBLIC
JOSIE A HAGEN
COMM. # 706267
COMMISSION EXPIRES
MAY 10, 2023
STATE OF UTAH

Exhibit E

Myles Glick Architect LLC
66 Rebellion Road, Charleston, SC
29407
mylesglickarchitectllc@live.com

March 8, 2018

Myles Glick, AIA LEED AP
Myles Glick Architect LLC
66 Rebellion Road
Charleston, South Carolina 29407

Mr. John C. Hayes IV
180 Meeting Street
Suite 305
Charleston, South Carolina 29401

Mr. I. Keith McCarty
McCarty Law Firm
1212 Wappoo Road
P.O. Box 30055
Charleston, South Carolina 29417

Re: Preliminary Report (Non Destructive and Destructive Review)
One Hamlin Place
Hamlin Plantation
Mt. Pleasant, South Carolina

In accordance with the request of the homeowners, the following report is presented to the One Hamlin Place Condominium Association for their review and use.

This report contains the results of the non-destructive reviews and the destructive testing. The non-destructive reviews took place on May 13, 2015, July10, 2015 and August 14, 2017. Additional destructive and additional non-destructive reviews took place on November 2,3, 2017. The exterior of the complex and the interior of one unit (#3013 Mohegan Way) was investigated on August 14, 2017. Nineteen (19) destructive test holes/areas of investigation were made on November 2, 2017 and twenty three (23) test holes on November 3, 2017 with additional interior reviews taking place (units #3077,#2044, #3001, #2020 and #2044).

This report is not a complete analysis of **a**ll building systems (mechanical, electrical, plumbing and structural) but rather a specific review of the building skin (walls) and roof/flashing systems. The review is focused on construction deficiencies that have resulted in water intrusion and building component failure. Additional construction

4. At the paneled walls, head flashing immediately above windows is not present and all sealant joints at window/trim intersections do not have the proper gap for a backer rod and sealant joint.
5. The windows are by YKK ap and are double flange single hung solid vinyl windows that do not allow for a proper engineered caulk joint at all trim intersections.
6. Most window and door head flashing is caulked shut.
7. Kick out flashing is missing at appropriate areas

B. Cementitious Siding

The Building Code allows alternative products to be used if they pass a compliance test by a third party testing agency. The cementitious product used at One Hamlin Place is primarily a product by Hardi Plank. In accordance with NER #409, Hardi Plank has been approved for use if it is installed in accordance with the manufacture's installation instructions. If it is not installed in accordance with the manufacture's installation instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-identified at this time. Installation requirements and therefore, construction deficiencies would be the same as Hardie Plank.

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2” ring shank hot dipped galvanized siding nail with a 0.22” nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

References to Hardie Plank are to all cementitious materials in this report. The 2008/09/12 Hardie Plank installation Instructions were published and available. Therefore they would apply to the installation of the Hardie Plank siding at One Hamlin Place. Common to all installation instructions are the following.

1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

C. Windows

After investigating all eleven buildings, it was determined that all windows are solid vinyl single hung with a DP of 50. They are not impact resistant windows. The

Exhibit F

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME I

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Friday, March 8, 2019

TIME: 10:07 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

* * * * * * * * * * * * * * * * *

Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

A. Pull out capacity.

Q. Gotcha. What is the other issue?

A. And then the spacing between the -- is more than 16 inches, and these studs are 16 inches on this building. And then all the pictures surrounding it illustrate the same thing. It's a long board. And then 21 actually is the HardiePlank label, so it is HardiePlank. 22, it's nailed too close to the butt joint. And almost on an inch; it's 7/8ths. So it's fairly close, but it's just too close to the edge. It should be an inch. It's 3/8ths. There's just not a holding power of the board left.

Q. Let me direct your attention to 32. We're now back to building 1. I think we talked earlier in the deposition that here the water intrusion that you can document with the -- is that -- in 32 and 33, am I seeing sealant splitting, or is that something else I'm looking at?

A. No, you're right. That's the sealant splitting. This is the end unit. I believe this window we're looking at is over the brick facade, which kind of goes up a little bit. This is the unit that Andrew was referring to. But you're

Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME II

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Monday, March 11, 2019

TIME: 9:15 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

* * * * * * * * * * * * * * * * *

Electronically signed by Eve Wilbanks (101-177-349-6970) 2caf5fd7-7266-43f7-9313-090df8197876

interpreting that; you're going to adopt what Russ says about that?

A. Yes, I'll defer to Russ. It's a structural issue.

Q. But your opinion is that the siding needs to be replaced?

A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Q. You were asked some questions and shown photographs of the -- I think it's been described as the white panels that were installed typically on the rear of the buildings with the flat roofs, correct?

A. Correct. They were also on bay windows on the sides, and they're also on the siding when some of the back areas turned the corner, as we saw on that very first unit. When you go in the project, with the brick facade, there's at least 12 feet of those panels that wrap the corner.

Q. Are any of those panel constructions on buildings 2, 4 or 6, which are the buildings with the sloped roofs?

A. I would have to go back and see if there's any bay windows on there.

Electronically signed by Eve Wilbanks (101-177-349-6970) 2caf5fd7-7266-43f7-9313-090df8197876

Exhibit G

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,	)	
Plaintiff,	)	
-versus-	)	Case No.: 2017-CP-10-5245
JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., et al.,	)	
Defendants.	)	

THE DEPOSITION OF RUSSELL T. MEASE was taken as a witness on behalf of the Defendants, pursuant to South Carolina Rules of Civil Procedure, at 10:00 a.m. on Thursday, the 14th day of March 2019, at the offices of Robertson Hollingsworth Manos & Rahn, 550 King Street, Suite 300, Charleston, South Carolina, before Janice O. Darby, Registered Professional Reporter and Notary Public in and for the State of South Carolina.

Janice Ohlendorf Darby, RPR
(843) 814-7666 jodarby@comcast.net

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

Q I understand. Just because other contractors may have done it in the community doesn't make it so, and you wouldn't rely on what other contractors may have done to support a opinion to a reasonable degree of engineering certainty as to what the contractors did in this case. Correct?

A True. But I'm relying on Mr. Glick and his evaluation of the property and him relaying to me that they were the typical nail that was used.

Q I understand. So again, the basis of your opinion that the fasteners used at all 11 buildings on this project on the HardiePlank were improper is based on six nails we see in DT 33 and photo 72 of Exhibit 36 and that Mr. Glick, the other primary expert in this case that did the investigation, told you that that's what he saw as being out on the project?

A Correct.

Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

used?

A Yes. That's the second part of item two under Recommendations where I document that condition.

Q So you note, "The use of improper fasteners will negatively affect the ability of the siding to resist wind loading."

A Yes. Mr. Glick gave other reasons also for needing to remove the siding, but mine is a supporting element to that recommendation.

Q And we talked about the fasteners used, and I know this is probably an over-generalization. But when we looked at that chart, assuming Mr. Glick was accurate and we do have the siding nails out there instead of the roofing nails, those generally are only sufficient up to about 80 miles an hour is what that chart told us?

A I think it was 70 at a 40-foot height, but yes.

Q I don't know that it matters, but just to make sure that I'm accurate as to what I was looking at, if we go back to page 27 of NER 405.

A Yes. A 40-foot height is 70 miles an hour.

Q Are there any other components or

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiffs vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (F/k/a JW Land Investment, LLC); RP Falcon Realty, LLC (f/k/a Wieland Realty, LLC); and Residential Partners, LLC, Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC, Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 RP FALCON PROPERTIES, LLC F/K/A JW HOMES, LLC, RP FALCON LAND, LLC, F/K/A JW LAND INVESTMENT, LLC, RP FALCON REALTY, LLC, F/K/A WIELAND REALTY, LLC, AND RESIDENTIAL PARTNERS, LLC **NOTICE OF MOTION AND MOTION TO RECONSIDER** ORDER GRANTING JORGE MEDINA, AND JORGE MEDINA A/K/A JMC CONSTRUCTION, LLC A/K/A JMC CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT

RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (hereinafter collectively referred to, for convenience and purposes of this motion only, as the "RP Companies") hereby moves the Court, pursuant to Rule 59(e) S.C.R.C.P, for an Order altering, amending, or vacating the Order filed April 22, 2022, granting Jorge Medina, and Jorge Medina A/K/A JMC Construction, LLC A/K/A

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JMC Construction, Inc.'s ("JMC") Motion for Summary Judgment. (A copy of the April 22, 2022 Form 4 Order is attached hereto as "Exhibit A").

Legal Standard

Rule 59 provides that "the court may open the judgment if one has been entered and amend his findings of fact and conclusions of law or make new findings and conclusions and direct the entry of a new judgment." NCNB S.C. v. Floyd, 303 S.C. 261, 263, 399 S.E.2d 794, 795 (Ct. App. 1990). It is proper to view a Rule 59(e) motion not only as a vehicle to request the trial court to "'alter or amend the judgment,' but also as a vehicle to seek 'reconsideration'" of issues and arguments. Elam v. S.C. Dep't of Transp., 361 S.C. 9, 21, 602 S.E.2d 772, 778 (2004).

Background

This is a construction defect action arising out of the construction of 11 townhomes known as One Hamlin Place ("One Hamlin"). RP Falcon Properties, LLC F/K/A JW Homes, LLC ("JW Homes") served as the general contractor for buildings 5 through 11 at One Hamlin Place (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as "One Hamlin Phase II"). JMC was a subcontractor who performed work at Buildings 5 and 6 at One Hamlin Phase II. See invoices and purchase orders reflecting JMC's work at One Hamlin Phase II ("Exhibit B") and JMC's Memorandum in Support of its Motion for Summary Judgment at page 5.

Plaintiffs filed this action against the RP Companies[1], among others, alleging deficiencies in the construction of the townhomes at One Hamlin. The RP Companies

[1] Plaintiffs allege a theory of amalgamation against JW Homes and other entities, including the RP Companies, relating to a series of transactions that occurred between 2009 through 2012. Plaintiffs claim that these entities and a number of others are amalgamated and that for purposes of any judgment that may be rendered in favor of the Plaintiff, these entities should be treated as a single business enterprise. Therefore, while RP Falcon Properties, LLC F/K/A JW Homes, LLC was the general contractor for One Hamlin Phase II, for the purposes of this motion, RP Falcon Properties,

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answered the Plaintiffs' complaint denying liability and filing cross-claims and a third-party complaint seeking indemnity from various subcontractors who performed the work at One Hamlin Phase II, alleging that these subcontractors must identify the RP Companies if and to the extent that the RP Companies are found liable to Plaintiffs for damages relating to the subcontractors' work. JMC moved for summary judgment on March 3, 2022, and the RP Companies subsequently filed a Memorandum in Opposition to JMC's Motion. See the RP Companies Memorandum in Opposition ("Exhibit C") and incorporated herein by reference. Oral argument was held on April 18, 2022, and on April 22, 2022 the Court entered a Form 4 Order granting JMC's Motion for Summary Judgment.

Argument

The Court's Form 4 Order did not make findings of fact or conclusions of law addressing the RP Companies' arguments in opposition to JMC's Motion for Summary Judgment. Accordingly, the RP Companies respectfully request the Court reconsider the RP Companies' arguments and enter an Order denying JMC's Motion for Summary Judgment.

The basis for JMC's Motion for Summary Judgment was two-fold. First, JMC argued that the RP Companies cannot pursue an action for equitable indemnity based on an alleged "negligence rule" that prevents joint tortfeasors from recovering from one another under a claim for equitable indemnity. Second, JMC argued that the RP Companies' claims for negligence, breach of contract, and breach of warranty were merely disguised claims for indemnity. In its Memorandum in Opposition and at oral argument, the RP Companies presented arguments supported by significant factual

LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (the "RP Companies") are each entitled to indemnity to the extent that Plaintiffs prove they are amalgamated.

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evidence, including the affidavit of JT McMickle, evidence of JMC's work on the property, excerpts of Plaintiffs' expert reports, and testimony from Plaintiffs' experts. See Exhibits B – G. This evidence, coupled with on-point case law, created a question of fact as to whether the RP Companies necessarily share in the fault of the alleged defective work performed by JMC at One Hamlin Phase II.

The Court's decision to grant summary judgment to JMC did not recognize the inherent issue OF FACT that exists in the determination of whether the RP Companies were without fault in this matter. The submission by JMC, which consisted of an excerpt from a deposition of a contractor that acknowledges that a general contractor has obligations relative to construction, did not and does not support the notion that there is no question of fact as to whether the RP Companies could be found by the fact finder to be without fault in this case. The deposition testimony cited by JMC does not establish the duty of a general contractor nor its breach. As argued at the hearing and as discussed in detail in the RP Companies' briefs, the South Carolina Appellate Courts determine the duties owed in this matter, and have unequivocally stated that a general contractor does not automatically become liable for the negligent acts of its subcontractors merely be virtue of the general contractor/subcontractor relationship.

In addition, the Court's Form 4 Order did not recognize that the RP Companies had presented evidence, and certainly at least "a scintilla" of evidence, warranting a determination by the fact finder in favor of the RP Companies' on their claims for indemnity, breach of contract, breach of warranty, and negligence against JMC. Anders v. South Carolina Farm Bureau Mut. Ins. Co. 307 S.C. 371, 375, 415 S.E.2d 406, 408 (Ct. App. 1992)(At the summary judgment stage it is only necessary for the nonmoving party to submit a scintilla of evidence warranting a determination by the jury). Furthermore, the

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Court did not take into consideration rulings from the South Carolina Supreme Court and South Carolina Court of Appeals, that make clear that under South Carolina law a general contractor is not automatically responsible for the fault of defective work put in place by its subcontractors.[2] Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80, 89 (2008)(rejecting the argument that a general contractor is automatically responsible for the negligence of its subcontractors); See also Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

Conclusion

In light of the foregoing, the RP Companies respectfully request that the Court reconsider its prior decision and alter, amend, and/or withdraw its Order granting JMC's Motion for Summary Judgment and enter an Order denying JMC's Motion for Summary Judgment.

(Signature page to follow)

[2] These cases were cited by the RP Companies in their Memorandum in Opposition and brought to the Court's attention during oral argument.

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Respectfully submitted,

PARKER POE ADAMS & BERNSTEIN LLP
200 Meeting Street, Suite 301
Charleston, SC 29401

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Thomas C. Hildebrand, Jr.
SC Bar # 2501
843.727.2653 (direct dial)
tomhildebrand@parkerpoe.com

W. Greyson Land
843.727.2462 (direct dial)
greysonland@parkerpoe.com

Attorneys for Defendant Residential Partners, LLC

And

By: s/ Blake A. McKie
Brian C. Duffy
Blake A. McKie
Duffy & Young, LLC
96 Broad Street
Charleston, SC 29401
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Fax (843) 720-2047
bduffy@duffyandyoung.com
bmckie@duffyandyoung.com

Attorneys for Defendants, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC

May 2, 2022

ELECTRONICALLY FILED - 2022 May 22 3:53 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Charleston
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2017CP1005246

Gary Keisler et al
PLAINTIFF(S)

John Wieland Homes and Neighborhoods of the Carolinas Inc as et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

☐ **JURY VERDICT**. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.

☑ **DECISION BY THE COURT**. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

☐ **ACTION DISMISSED** (*CHECK REASON*): ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other

☐ **ACTION STRICKEN** (*CHECK REASON*): ☐ Rule 40(j), SCRCP; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other

☐ **STAYED DUE TO BANKRUPTCY**

☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** *(CHECK APPLICABLE BOX)*: ☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☑ Statement of Judgment by the Court:

This matter came before the Court as JMC Construction, LLC's Motion for Summary Judgment or Motion to Bifurcate Trial heard on April 18, 2022.

Defendant JMC Construction, LLC's Motion for Summary Judgment is granted. The Motion to bifurcate is moot.

ORDER INFORMATION

This order ☐ ends ☑ does not end the case. ☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 04/22/2022 .

Chad Hood
Bills Painting
William C Mulhern
Mora Construction LLC
Benjamin Mora Construction LLC
Moras Construction
Mora Construction
Benjamin L Mora
Benjamin Mora
Glenn Clark Construction
Polly S Clark
Anthony Kirksey
Creative Construction
Evans Enterprises
Coy Cy Construction
Residental Partners LLC
Emmanuel Kehagis
A Marc Inc
Gonzalo Guerrero
Alex Welch
Jack Clark Construction LLC
Jack R Clark
Wieland Realty LLC
Rp Falcon Realty LLC
Jw Land Investment LLC
Rp Falcon Land Llc
JW Homes LLC
RP Falcon Properties LLC
AC Construction Corp
Builders Firstsource Southeast Group LLC
AAA Coastline Inc
Andrea DaCosta
Frankcisco DaCosta

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

ELECTRONICALLY FILED - 2022 May 22 3:53 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

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Charleston Common Pleas

Case Caption: Gary Keisler , plaintiff, et al VS John Wieland Homes and Neighborhoods of the Carolinas Inc as , defendant, et al

Case Number: 2017CP1005246

Type: Order/Electronic Form 4

IT IS SO ORDERED!

/s Hon. Bentley D. Price, Circuit Judge 2766

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850391 Date: 6/22/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: T0357 ~~53835~~-JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0010
One Hamlin Place
3041 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~23.2000~~ 22	160.000	~~3,712.00~~ 3740.00
scbaywnddbl	double bay window	each	1.0000	500.000	~~500.00~~ 500.00
sccrown	crown mold & frieze	lf	~~157.0000~~ 593	3.000	~~471.00~~ 1779.00
scfascia	fascia and soffit	lf	~~157.0000~~ 129	7.000	~~1,099.00~~ 903.00

Sub-Total ~~6,782.00~~
Sales Tax 0.00
Total Amt ~~6,782.00~~ 6892.00

Authorized Signature:
By:
Title: DS
Date: 4/23/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
4/12/2013	2304

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 10

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
12	pe	1pediment	70.00	840.00
87	ba	1installband	6.00	522.00
22	s	1sidingtrim	170.00	3,740.00
129	c	1fascia	7.00	903.00
129	fr	frieze	3.00	387.00
1	bay	1baydouble	500.00	500.00

Geoff Bristol

Total $6,892.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850840 Date: 6/25/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: s3835-JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0011
One Hamlin Place
3045 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~12.7000~~ 16	160.000	~~2,032.00~~	2720.00
sccrown	crown mold & frieze	lf	60 ~~92.0000~~ 76	3.000	~~276.00~~	190.00
scfascia	fascia and soffit	lf	~~92.0000~~ 26	7.000	~~644.00~~	182.00

Sub-Total ~~2,952.00~~ 3092.00
Sales Tax 0.00
Total Amt ~~2,952.00~~ 3082.00

Authorized Signature:
By: [signature]
Title: ACG
Date: 7/12/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By: [signature]
Title: PAYMENT APPROVED BY ADAM JOHNSON VP CONSTRUCTION-CHS
Date:

Close

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
4/12/2013	2305

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 11

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
16	s	1sidingtrim	170.00	2,720.00
26	c	1fascia	7.00	182.00
26	fr	frieze	3.00	78.00
17	ba	1installband	6.00	102.00

Geoff Bristol

Total $3,082.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850886 Date: 6/25/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

t0357
To: ~~s3835~~ JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0012
One Hamlin Place
3049 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use Description		Unit	Quantity	Price	Extension
0NOTEALIST	PO is for entire scope of work. VPOs will not be accepted	note	0.1400	0.000	0.00
1sidingtrim	Install all siding includes PT band	sqr	~~23.2000~~ 22	160.000	~~2,712.00~~ 3740.00
scbaywnddbl	double bay window	each	1.0000	500.000	500.00 ✓
sccrown	crown mold & frieze	lf	~~157.0000~~ 662	3.000	~~471.00~~ 1986.00
scfascia	fascia and soffit	lf	~~157.0000~~ 133	7.000	~~1,099.00~~ 931.00

board & batt.

Sub-Total	~~5,782.00~~
Sales Tax	0.00
Total Amt	~~5,782.00~~ 6657.00

PAYMENT ... CONSTRUC...

Authorized Signature:
By: [signature]
Title: ASR
Date: 5/15/13

Vendor\Sub-Contractor:
By: [signature]
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

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JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Invoice

Date	Invoice #
4/12/2013	2306

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 12

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
22	s	1sidingtrim	170.00	3,740.00
133	c	1fascia	7.00	931.00
133	fr	frieze	3.00	399.00
88	ba	1installband	6.00	528.00
8	pe	1pediment	70.00	560.00
1	bay	1baydouble	500.00	500.00

Geoff Bristol

Total $6,651.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846465 Date: 6/11/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: ~~c3835~~ t0357 -JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0032
One Hamlin Place
2000 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Forsythia1

Will Call To Verify Ship Date.

Est Date Required:

Superintendent: ADAM ANDERSON

F.O.B.:

Payment Terms: Weekly Trades

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	0 ~~1,240.000~~	~~4.000~~	~~4,240.00~~
sccrown	crown mold & frieze	lf	287 ~~1000~~	3.000	~~831.00~~ 8613.00
scfascia	fascia and soffit	lf	0 ~~1,939.0000~~	7.000	~~1,939.00~~
	board board and batten w/ double corner				
					Sub Total ~~7,010.00~~
					Sales Tax 0.00
					Total Amt ~~7,010.00~~ 8613.00

Authorized Signature:
By:
Title: Mgr
Date: 1/24/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

MC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Invoice

Date	Invoice #
1/20/2013	2210

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 32

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
27.5	s	1sidingtrim	170.00	4,675.00
207	c	1fascia	7.00	1,449.00
207	fr	frieze	3.00	621.00
78	ba	1installband	6.00	468.00
10	pe	1pediment	70.00	700.00
1	bay	1baydouble	500.00	500.00
1	dor	1dormer	200.00	200.00

Geoff Bristol

Total $8,613.00

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846467 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0032
One Hamlin Place
2000 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~30.0000~~ 31	35.000	~~1,050.00~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,190.00~~
Sales Tax 0.00
Total Amt ~~1,190.00~~ → 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By: ADAM C ANDERSON
Title: CONSTRUCTION MANAGER
Date:
PAYMENT APPROVED BY

Close

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JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Invoice

Date	Invoice #
10/7/2012	2045

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 32 2000 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00

Total $1,390.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846547 Date: 6/11/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

t0357

To: ~~s3835~~ JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0033
One Hamlin Place
2004 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~25.6000~~ 0	~~160.000~~	~~2,176.00~~
sccrown	crown mold & frieze	lf	~~1840~~	3.000	~~609.00~~ $520.00
scfascia	fascia and soffit	lf	~~2[illegible].0000~~ 0	7.000	~~1,421.00~~

~~Sub Total 4,206.00~~
~~Sales Tax 0.00~~
Total Amt ~~4,206.00~~ 5520.00

Authorized Signature:
By:
Title: COO
Date: 1/21/13

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Invoice

Construction, LLC

16 Meeting St.
North Charleston, SC 29405

Date	Invoice #
1/20/2013	2211

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 33

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
14	s	1sidingtrim	170.00	2,380.00
212	e	1fascia	7.00	1,484.00
212	fr	frieze	3.00	636.00
1	dor	1dormer	200.00	200.00
10	pe	1pediment	70.00	700.00
20	ba	1installband	6.00	120.00

Geoff Bristol

Total $5,520.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846549 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0033
One Hamlin Place
2004 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~31.0000~~ 34	35.000	~~1,085.00~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,225.00~~
Sales Tax 0.00
Total Amt ~~1,225.00~~ 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By:
Title: ADAM C ANDERSON CONSTRUCTION MANAGER
Date:

PAYMENT APPROVED BY
Close

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Invoice

JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Date	Invoice #
10/7/2012	2046

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 33 2004 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00

Total $1,390.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02893733 Date: 12/5/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: ~~3835~~ 6035 JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0034
One Hamlin Place
2008 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: GEOFF BRISTOL

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~0~~ 2874	170.000	~~4,335.00~~ 8613.00
sccrown	crown mold & frieze	lf	~~255.0000~~	3.000	~~831.00~~
scfascia	fascia and soffit	l	~~0~~ 277.0000	7.000	~~1,939.00~~
~~Pedestals~~	~~bay/double~~	~~4~~	~~500.00~~		
~~dormer~~	~~band board~~	~~1~~	~~200.00~~		
		~~5/8~~	~~6.00~~		

~~Sub-Total 7,105.00~~
~~Sales Tax 0.00~~
Total Amt ~~7,105.00~~ 8613.00

Authorized Signature:
By:
Title: Sup
Date: 1/21/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close
PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

Invoice

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JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
1/20/2013	2212

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 34

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
27.5	s	1sidingtrim	170.00	4,675.00
207	c	1fascia	7.00	1,449.00
207	fr	frieze	3.00	621.00
10	pe	1pediment	70.00	700.00
1	bay	1baydouble	500.00	500.00
1	dor	1dormer	200.00	200.00
78	ba	1installband	6.00	468.00

Geoff Bristol

Total $8,613.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846513 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0034
One Hamlin Place
2008 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~30.1000~~ 34	35.000	~~1,053.50~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,193.50~~
Sales Tax 0.00
Total Amt ~~1,193.50~~ 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
PAYMENT APPROVED BY
ADAM C ANDERSON
CONSTRUCTION MANAGER
Title:
Date:

Close

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Invoice

JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Date	Invoice #
10/7/2012	2047

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 34 2008 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00

Total $1,390.00

ELECTRONICALLY FILED - 2022 May 02 3:35 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiffs vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (F/k/a JW Land Investment, LLC); RP Falcon Realty, LLC (f/k/a Wieland Realty, LLC); and Residential Partners, LLC, Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC, Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 RP FALCON PROPERTIES, LLC F/K/A JW HOMES, LLC, RP FALCON LAND, LLC, F/K/A JW LAND INVESTMENT, LLC, RP FALCON REALTY, LLC, F/K/A WIELAND REALTY, LLC, AND RESIDENTIAL PARTNERS, LLC MEMORANDUM IN OPPOSITION TO JORGE MEDINA, AND JORGE MEDINA A/K/A JMC CONSTRUCTION, LLC A/K/A JMC CONSTRUCTION, INC.'S MOTION FOR SUMMARY JUDGMENT

RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as the "RP Companies") hereby submit this

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memorandum in opposition to Defendant Jorge Medina, And Jorge Medina A/K/A JMC Construction, LLC A/K/A JMC Construction, Inc.'s ("JMC") Motion for Summary Judgment.

Introduction

This is a motion for summary judgment by a subcontractor against a general contractor on the general contractor's claims for equitable indemnity. This motion should be denied as under South Carolina law a general contractor is not automatically liable for the negligence of its subcontractors. See Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80,89 (2008). Instead, whether, and to what extent a general contractor is liable for the negligence of its subcontractors is a question for the fact-finder to determine. Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

Background

This is a construction defect action arising out of the construction of 11 townhomes known as One Hamlin Place ("One Hamlin"). RP Falcon Properties, LLC F/K/A JW Homes, LLC ("JW Homes") served as the general contractor for buildings 5 through 11 at One Hamlin Place (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as "One Hamlin Phase II"). The Certificates of Occupancy ("CO") for One Hamlin Phase II were issued between April 23, 2013 and November 25, 2014 and identify JW Homes or JW Homes LLC as the contractor. See Exhibit A. The COs for Buildings 1 through 4 of One Hamlin were issued between August 5, 2009 and April 5, 2012 and identify John Wieland Homes & Neighborhood of the Carolinas as the contractor. See Exhibit B.

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Plaintiffs filed this action against the RP Companies[1], among others, alleging deficiencies in the construction of the townhomes at One Hamlin. The RP Companies answered the Plaintiffs' complaint denying liability and filing cross-claims and a third-party complaint seeking indemnity from various subcontractors who performed the work at One Hamlin Phase II, alleging that these subcontractors must identify the RP Companies if and to the extent that the RP Companies are found liable to Plaintiffs for damages relating to the subcontractors' work. JMC was a subcontractor who performed work at Buildings 5 and 6 at One Hamlin Phase II and has moved for summary judgment as to the RP Companies' claims. See purchase orders and invoices reflecting work performed by JMC ("Exhibit C") and JMC's Memorandum in Support at page 5. This motion should be denied as JMC cannot establish that the undisputed facts show that JMC is entitled to judgment against the RP Companies as a matter of law.

Argument

I. JMC is not Entitled to Summary Judgment on the RP Companies' claim for Indemnity.

Genuine issues of material fact exists as to whether, and to what extent, the RP Companies are entitled to recover indemnity from JMC for JMC's work at One Hamlin Phase II. JW Homes did not self-perform the construction at One Hamlin Phase II. See Affidavit of JT McMickle ("Exhibit D"). Instead it paid subcontractors, such as JMC, to perform the construction, including the work at One Hamlin Phase II claimed to be

[1] Plaintiffs allege a theory of amalgamation against JW Homes and other entities, including the RP Companies, relating to a series of transactions that occurred between 2009 through 2012. Plaintiffs claim that these entities and a number of others are amalgamated and that for purposes of any judgment that may be rendered in favor of the Plaintiffs, these entities should be treated as a single business enterprise. Therefore, while RP Falcon Properties, LLC F/K/A JW Homes, LLC was the general contractor for One Hamlin Phase II, for the purposes of this motion, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (the "RP Companies") are each entitled to indemnity to the extent that Plaintiffs prove they are amalgamated.

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deficient in this suit. Id. and Exhibit C. While the RP Companies deny Plaintiffs' claims, Plaintiffs seek damages from the RP Companies for JMC's work at One Hamlin Phase II. JMC installed the siding at Buildings 5 and 6. See Exhibit C. Plaintiffs contend there are deficiencies with the installation of the siding at those buildings.[2] Specifically, Plaintiffs' experts claim as defective and call for the complete removal and replacement of the siding installed by JMC:

instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2" ring shank hot dipped galvanized siding nail with a 0.22" nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

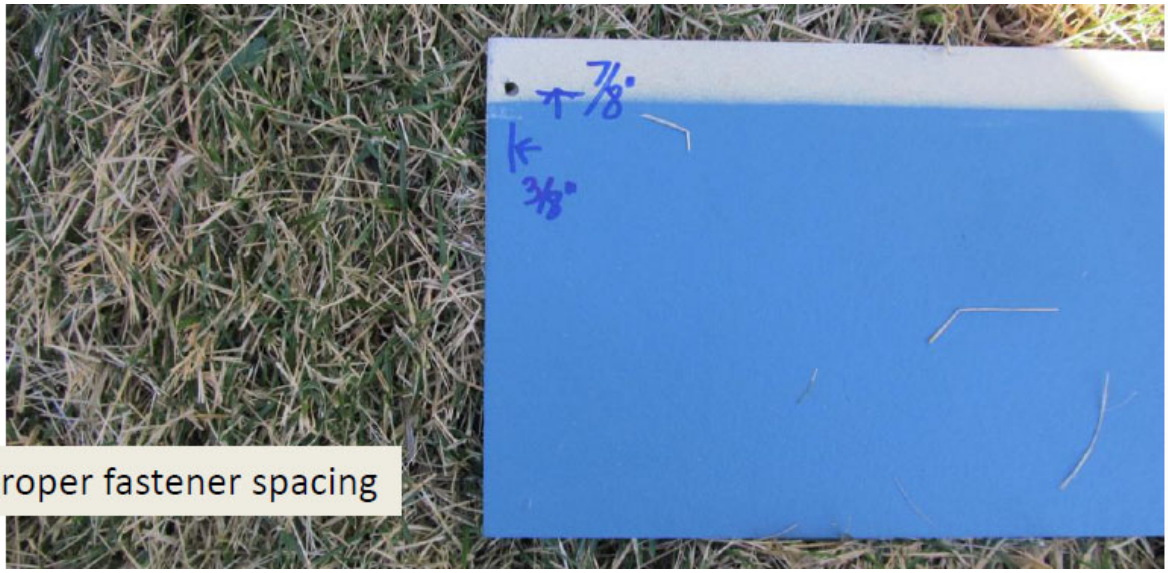
1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

Excerpts from the report of Myles Glick, AIA, dated March 8, 2018 at page 3. (Exhibit E)

[2] To survive summary judgment, the RP Companies need only show that at least some of JMC's work at One Hamlin Phase II is complained-of. For the sake of expediency and economy of briefing this memo does not purport to include a full listing of JMC's complained-of work at One Hamlin Phase II.

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Q. Gotcha. What is the other issue?
A. And then the spacing between the -- is more than 16 inches, and these studs are 16 inches on this building. And then all the pictures surrounding it illustrate the same thing. It's a long board. And then 21 actually is the HardiePlank label, so it is HardiePlank. 22, it's nailed too close to the butt joint. And almost on an inch; it's 7/8ths. So it's fairly close, but it's just too close to the edge. It should be an inch. It's 3/8ths. There's just not a holding power of the board left.



Improper fastener spacing

Deposition of Myles Glick, AIA dated March 8, 2019, page 135 line 2 – line 13 (Exhibit F) and photo from Myles Glick's file referenced in the above testimony.

Q. But your opinion is that the siding needs to be replaced?
A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Deposition of Myles Glick, AIA dated March 11, 2019, page 268 line 5 – page 268 line 9. (Exhibit F).

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Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

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used?

A Yes. That's the second part of item two under Recommendations where I document that condition.

Deposition of R. Mease, dated March 14, 2019, page 136 line 19 – page 137 line 4. (Exhibit G)

JMC argues that the RP Companies cannot maintain an equitable indemnity claim against the subcontractors based on the "negligence rule" that prevents joint tortfeasors from recovering from one another under a claim for equitable indemnity. As an initial point, the RP Companies have standing to assert equitable indemnity claims because "[a] general contractor's relationship with its subcontractor in the residential construction context is sufficient to support the general contractor's right of equitable indemnity against the subcontractor." Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

> "To recover damages on its equitable indemnity claim, [the general contractor] must prove the following: (1) [the subcontractor] was at fault in causing [the homeowner's] water intrusion damages; (2) [the general contractor] has no fault for those damages; and (3) [the general contractor] incurred expenses that were necessary to protect its interest in defending against [the homeowner's] claim."

Id.

In Stoneledge, the Court of Appeals held that a general contractor does not necessarily share in the fault of defective work put in place by its subcontractors, and

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therefore, is able to recover from a subcontractor under a claim for equitable indemnity. Id.; See also Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80,89 (2008)(A general contractor is not automatically responsible for the negligence of a subcontractor).

Accordingly, because the RP Companies can prove at trial that they do not necessarily share in the fault of the alleged defective siding installation performed by JMC, genuine issues of material fact exist as to whether, and to what extent, the RP Companies can recover indemnity from JMC. Id.; Exhibit D. This factual dispute will not be resolved until trial when Plaintiffs' claims against the RP Companies, and the RP Companies' indemnity claims against its subcontractors, are heard and resolved.

II. JMC's Motion regarding "disguised indemnity" under Stoneledge should be denied.

JMC argues that the RP Companies' crossclaims for negligence, breach of warranty and breach of contract are not independent causes of action but merely "disguised indemnity claims." JMC's Memorandum in Support at page 9 – 12. The RP Companies do not dispute that, under Stoneledge, its negligence, breach of warranty, and breach of contract causes of action form the substantive basis for its indemnity claim. However, these causes of action are not a veiled indemnity claim because the RP Companies will introduce evidence of the subcontractors' breaches that underpin the indemnity claim. As such, these claim, whether labeled "causes of action" or "basis for indemnity" are valid and should not be dismissed.

Conclusion

JMC's motion for summary judgment should be denied, and the matter of the JMC's potential liability to the RP Companies should be submitted to the jury after all the

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evidence is heard on Plaintiffs' claims against the RP Companies and the RP Companies' claims against JMC.

Respectfully submitted,

PARKER POE ADAMS & BERNSTEIN LLP
200 Meeting Street, Suite 301
Charleston, SC 29401

By: s/ Thomas C. Hildebrand, Jr.
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Attorneys for Defendant Residential Partners, LLC

And

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Charleston, SC 29401
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bmckie@duffyandyoung.com

Attorneys for Defendants, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC

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Exhibit A

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TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/20/2014

PERMIT # RN-13-097683

PROJECT NAME: JW Homes

ADDRESS: 3061 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

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TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

07/26/2013

PERMIT # RN-12-092021

PROJECT NAME: John Wieland

ADDRESS: 3041 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

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Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

06/04/2013

PERMIT # RN-12-092020

PROJECT NAME: John Wieland Homes

ADDRESS: 3045 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

06/03/2013

PERMIT # RN-12-092015

PROJECT NAME: John Wieland Homes

ADDRESS: 3049 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/28/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-097682

PROJECT NAME: JW Homes

ADDRESS: 3053 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/20/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-097681

PROJECT NAME: JW Homes

ADDRESS: 3057 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/04/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-099693

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3065 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/16/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-099694

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3069 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/17/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-099696

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3073 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/19/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-099702

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3077 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/25/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-14-103063

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3081 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/25/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-14-103066

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3085 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Townhome
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/24/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-14-103071

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3089 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/24/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-14-103072

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3093 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/02/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-101762

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2032 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/15/2014

PERMIT # RN-13-101734

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2036 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/29/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-101728

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2040 Amenity Park Dr.
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/09/2014

PERMIT # RN-13-101727

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2044 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Townhome
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/19/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-096959

PROJECT NAME: JW Homes

ADDRESS: 2016 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/11/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-096939

PROJECT NAME: JW Homes

ADDRESS: 2020 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/22/2014

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-096936

PROJECT NAME: JW Homes

ADDRESS: 2024 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

12/19/2013

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

PERMIT # RN-13-096932

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502
Mt Pleasant

PROPERTY ADDRESS: 2028 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Single Family Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/17/2013

PERMIT # RN-12-091555

PROJECT NAME: John Wieland

ADDRESS: 2000 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Dwelling 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2749

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/23/2013

PERMIT # RN-12-091606

PROJECT NAME: John Wieland

ADDRESS: 2004 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Townhome 2006 IRC & IECC

PROPOSED USE:
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2676

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant
Came On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

04/23/2013

PERMIT # RN-12-091604

PROJECT NAME: John Wieland

ADDRESS: 2008 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Home 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Exhibit B

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

07/26/2010

PERMIT #	RN-08-075072
PROJECT NAME:	John Wieland Homes
ADDRESS:	3017 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2003 IRC NEW FLOOD REGS
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2862

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/12/2011

PERMIT #	**RN-10-083723**
PROJECT NAME:	John Wieland
ADDRESS:	2041 Amenity Park Dr
CITY, ST ZIP:	Mt Pleasant, SC 29466
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/22/2011

PERMIT #	**RN-10-083743**
PROJECT NAME:	John Wieland Homes
ADDRESS:	2045 Amenity Park Dr
CITY, ST ZIP:	Mt Pleasant, SC 29466
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2676

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/05/2009

PERMIT #	**RN-08-075060**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3001 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	**2847**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/31/2010

PERMIT #	**RN-08-075062**
PROJECT NAME:	**John Wieland**
ADDRESS:	**3005 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**2652**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/14/2009

PERMIT #	RN-08-075063
PROJECT NAME:	John Wieland Homes
ADDRESS:	3009 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas 3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2003 IRC NEW FLOOD REGS
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2652

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/23/2010

PERMIT #	**RN-08-075069**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3013 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29464**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE: / **OCCUPANCY TYPE:**	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**3038**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/16/2011

PERMIT #	RN-10-081288
PROJECT NAME:	John Wieland
ADDRESS:	3022 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2750

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/08/2011

PERMIT #	**RN-10-083801**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3025 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC Flood AE 14 + 1
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2966

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/21/2011

PERMIT #	**RN-10-081226**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3026 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3119

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

04/05/2012

PERMIT #	**RN-10-083902**
PROJECT NAME:	John Wieland
ADDRESS:	3029 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC Flood Zone AE 14 + 1
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2705

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/02/2011

PERMIT #	**RN-10-081234**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3030 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29464**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**3081**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/07/2012

PERMIT #	**RN-10-083932**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3033 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29466**
Contractor's Name	**John Wieland Homes & Neighborhood of Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC - Flood AE 14 + 1**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**2675**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/15/2011

PERMIT #	**RN-10-081201**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3034 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/23/2011

PERMIT #	**RN-10-083933**
PROJECT NAME:	John Wieland
ADDRESS:	3037 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC - Flood AE 14 + 1
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3726

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Exhibit C

RECORD ON APPEAL 1206

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850391 Date: 6/22/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: T0357 ~~53835~~-JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0010
One Hamlin Place
3041 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~23.2000~~ 22	160.000	~~3,712.00~~ 3740.00
scbaywnddbl	double bay window	each	1.0000	500.000	~~500.00~~ 500.00
sccrown	crown mold & frieze	lf	~~157.0000~~ 593	3.000	~~471.00~~ 1779.00
scfascia	fascia and soffit	lf	~~157.0000~~ 129	7.000	~~1,099.00~~ 903.00

[redacted]

Sub-Total [redacted]
Sales Tax 0.00
Total Amt ~~5,782.00~~ 6892.00

Authorized Signature:
By: [signature]
Title: DS
Date: 4/23/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
4/12/2013	2304

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 10

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
12	pe	1pediment	70.00	840.00
87	ba	1installband	6.00	522.00
22	s	1sidingtrim	170.00	3,740.00
129	c	1fascia	7.00	903.00
129	fr	frieze	3.00	387.00
1	bay	1baydouble	500.00	500.00

Geoff Bristol

Total $6,892.00

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850840 Date: 6/25/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: s3835-JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0011
One Hamlin Place
3045 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~12.7000~~ 16	160.000	~~2,032.00~~ 2720.00
sccrown	crown mold & frieze	lf	60 ~~92.0000~~ 76	3.000	~~276.00~~ 180.00
scfascia	fascia and soffit	lf	~~92.0000~~ 26	7.000	~~644.00~~ 182.00

Sub-Total ~~2,952.00~~ 3082.00
Sales Tax 0.00
Total Amt ~~2,952.00~~ 3082.00

Authorized Signature:
By: [signature]
Title: ACG
Date: 7/12/12

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By: [signature]
Title: PAYMENT APPROVED BY ADAM JOHNSON VP CONSTRUCTION-CHS
Date:

Close

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
4/12/2013	2305

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 11

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
16	s	1sidingtrim	170.00	2,720.00
26	c	1fascia	7.00	182.00
26	fr	frieze	3.00	78.00
17	ba	1installband	6.00	102.00

Geoff Bristol

Total $3,082.00

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ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02850886 Date: 6/25/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

t0357
To: ~~s3835~~ JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0012
One Hamlin Place
3049 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 720

Resource/Use Description		Unit	Quantity	Price	Extension
0NOTEALIST	PO is for entire scope of work. VPOs will not be accepted	note	0.1400	0.000	0.00
1sidingtrim	Install all siding includes PT band	sqr	~~23.2000~~ 22	160.000	~~2,712.00~~ 3740.00
scbaywnddbl	double bay window	each	1.0000	500.000	500.00 ✓
sccrown	crown mold & frieze	lf	~~157.0000~~ 662	3.000	~~471.00~~ 1986.00
scfascia	fascia and soffit	lf	~~157.0000~~ 133	7.000	~~1,099.00~~ 931.00

board & batt.

Sub-Total	~~5,782.00~~
Sales Tax	0.00
Total Amt	~~5,782.00~~ 6657.00

PAYMENT ... CONSTRUC...

Authorized Signature:
By: [signature]
Title: JSR
Date: 5/15/13

Vendor\Sub-Contractor:
By: [signature]
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Invoice

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
4/12/2013	2306

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 12

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			4/12/2013			

Quantity	Item Code	Description	Price Each	Amount
22	s	1sidingtrim	170.00	3,740.00
133	c	1fascia	7.00	931.00
133	fr	frieze	3.00	399.00
88	ba	1installband	6.00	528.00
8	pe	1pediment	70.00	560.00
1	bay	1baydouble	500.00	500.00

Geoff Bristol

Total $6,651.00

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846465 Date: 6/11/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: ~~c3835~~ t0357 -JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0032
One Hamlin Place
2000 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Forsythia1

Will Call To Verify Ship Date.

Est Date Required:

Superintendent: ADAM ANDERSON

F.O.B.:

Payment Terms: Weekly Trades

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~0~~	~~180.000~~	~~4,240.00~~
sccrown	crown mold & frieze	lf	~~287~~	3.000	~~831.00~~ 8613.00
scfascia	fascia and soffit	lf	~~0~~	7.000	~~1,939.00~~
board board and features bay/double dormer					

~~Sub-Total 7,010.00~~
~~Sales Tax 0.00~~
Total Amt ~~7,010.00~~ 8613.00

Authorized Signature:
By:
Title:
Date: 1/24/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Invoice

MC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
1/20/2013	2210

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 32

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
27.5	s	1sidingtrim	170.00	4,675.00
207	c	1fascia	7.00	1,449.00
207	fr	frieze	3.00	621.00
78	ba	1installband	6.00	468.00
10	pe	1pediment	70.00	700.00
1	bay	1baydouble	500.00	500.00
1	dor	1dormer	200.00	200.00

Geoff Bristol

Total $8,613.00

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846467 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0032
One Hamlin Place
2000 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~30.0000~~ 31	35.000	~~1,050.00~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,190.00~~
Sales Tax 0.00
Total Amt ~~1,190.00~~ → 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By: ADAM C ANDERSON
Title: CONSTRUCTION MANAGER
Date:
PAYMENT APPROVED BY

Close

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Invoice

Date	Invoice #
10/7/2012	2045

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 32 2000 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00

Total $1,390.00

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846547 Date: 6/11/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

t0357

To: ~~s3835~~ JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0033
One Hamlin Place
2004 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~25.6000~~	~~160.000~~	~~2,176.00~~
sccrown	crown mold & frieze	lf	1840 ~~2576.0000~~	3.000	~~609.00~~ $5520.00
scfascia	fascia and soffit	lf	~~2576.0000~~	7.000	~~1,421.00~~

~~Sub-Total 4,206.00~~
~~Sales Tax 0.00~~
Total Amt ~~4,206.00~~ 5520.00

Authorized Signature:
By:
Title: COO
Date: 1/21/13

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

https://jwhomelink.com/OnLinePOs/ViewPO.asp?PONumber=02846547&FromSchedule=... 10/9/2012

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Invoice

Construction, LLC

16 Meeting St.
North Charleston, SC 29405

Date	Invoice #
1/20/2013	2211

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 33

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
14	s	1sidingtrim	170.00	2,380.00
212	e	1fascia	7.00	1,484.00
212	fr	frieze	3.00	636.00
1	dor	1dormer	200.00	200.00
10	pe	1pediment	70.00	700.00
20	ba	1installband	6.00	120.00

Geoff Bristol

Total $5,520.00

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846549 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0033
One Hamlin Place
2004 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: ADAM ANDERSON

F.O.B.:
Payment Terms: Weekly Trades
Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~31.0000~~ 34	35.000	~~1,085.00~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,225.00~~
Sales Tax 0.00
Total Amt ~~1,225.00~~ 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By:
Title:
Date:

Approved For Payment:
By:
Title: ADAM C ANDERSON CONSTRUCTION MANAGER
Date:

PAYMENT APPROVED BY
Close

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Invoice

JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Date	Invoice #
10/7/2012	2046

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 33 2004 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00

Total $1,390.00

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02893733 Date: 12/5/2012 For: (33700) Siding/Cornice Labor Print JRJC Form

To: ~~3835~~ 6035 JMC CONSTRUCTION
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0034
One Hamlin Place
2008 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: GEOFF BRISTOL

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~0~~ 2874	170.000	~~4,335.00~~ 8613.00
sccrown	crown mold & frieze	lf	~~255.0000~~	3.000	~~831.00~~
scfascia	fascia and soffit	l	~~0~~ 1,000	7.000	~~1,939.00~~
~~Pedestals~~	~~bay/double~~	~~4~~	~~500.00~~		
~~dormer~~	~~bandboard~~	~~1~~	~~200.00~~		
		~~5/8~~	~~6.00~~		

~~Sub-Total 7,105.00~~
~~Sales Tax 0.00~~
Total Amt ~~7,105.00~~ 8613.00

Authorized Signature:
By:
Title: Sup
Date: 1/21/13

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title:
Date:

Close
PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

PAYMENT APPROVED BY
KEVIN M POPSON
PRESIDENT-CHARLESTON

Invoice

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON COMMON PLEAS - CASE#2017CP1005246

JMC Construction, LLC

4116 Meeting St.
North Charleston, SC 29405

Date	Invoice #
1/20/2013	2212

Bill To	Ship To
John Wieland Homes	One Hamlin Place unit 34

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			1/20/2013			

Quantity	Item Code	Description	Price Each	Amount
27.5	s	1sidingtrim	170.00	4,675.00
207	c	1fascia	7.00	1,449.00
207	fr	frieze	3.00	621.00
10	pe	1pediment	70.00	700.00
1	bay	1baydouble	500.00	500.00
1	dor	1dormer	200.00	200.00
78	ba	1installband	6.00	468.00

Geoff Bristol

Total $8,613.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02846513 Date: 6/11/2012 For: (34000) Roof Labor #1 EF

To: s3835-JMC CONSTRUCTION, LLC
4116 MEETING STREET ROAD
N. CHARLESTON SC 29405

Ship To: ohp-t/000/0034
One Hamlin Place
2008 Amenity Park Drive
Mt. Pleasant SC 29464

Reverse Forsythia1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: ADAM ANDERSON

Group: 716

Resource/Use	Description	Unit	Quantity	Price	Extension	
1rooflabor	Roof Labor Turnkey Except Shingles&Leadboots	sq	~~30.1000~~ 34	35.000	~~1,053.50~~	1190.00
rffelt	Roofing Felt Labor (installed rolls only)	roll	~~7.0000~~ 10	20.000	~~140.00~~	200.00

Sub-Total ~~1,193.50~~
Sales Tax 0.00
Total Amt ~~1,193.50~~ 1390.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
PAYMENT APPROVED BY
ADAM C ANDERSON
CONSTRUCTION MANAGER
Title:
Date:

Close

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Invoice

JMC CONSTRUCTION, LLC

4116 Meeting St.
North Charleston, SC 29405
vendor #s3835

Date	Invoice #
10/7/2012	2047

Bill To
John Wieland Homes

Ship To
One Hamlin Place unit 34 2008 amenity park dr

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
			10/7/2012			

Quantity	Item Code	Description	Price Each	Amount
34	r	1rooflabor	35.00	1,190.00
10	fe	1installfelt	20.00	200.00

Total $1,390.00

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Exhibit D

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiffs vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 AFFIDAVIT OF JT MCMICKLE

PERSONALLY APPEARED before me, JT McMickle who, being first duly sworn, deposes and says:

1. I am over 18 years of age and otherwise competent to provide this affidavit and the testimony herein.

2. I served as Chief Financial Officer for RP Falcon Properties, LLC f/k/a JW Homes, LLC ("JW Homes") during the time of construction of Buildings 5 through 11 of

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

the One Hamlin Townhome project (hereinafter collectively referred to, for convenience and purposes of this affidavit only, as "One Hamlin Phase II").

3. That JW Homes did not self-perform work at One Hamlin Phase II.

4. That subcontractors were paid to perform the work at One Hamlin Phase II.

5. I have personal knowledge of the business records of JW Homes.

6. That the purchase orders and invoices produced by JW Homes are part of the business records of JW Homes.

7. That the purchase orders and invoices produced by JW Homes in this case are kept in the regular course of JW Homes' business.

8. That it was the regular practice of JW Homes to create the purchase orders invoices at or about the time the work described on the purchase orders or invoices was performed.

9. That based on my review of the business records of JW Homes for One Hamlin Phase II, All Exteriors Construction, LLC ("All Exteriors") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5, 7, 8, 9, 10, and 11, including the siding installation at buildings 7-11 of One Hamlin Phase II.

10. That based on my review of the business records of JW Homes for One Hamlin Phase II, Jorge Medina, And Jorge Medina A/K/A JMC Construction, LLC A/K/A JMC Construction, Inc.'s ("JMC") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5 and 6 of One Hamlin Phase II, including the installation of the siding at Buildings 5 and 6.

Further, AFFIANT SAYETH NOT.

(Signature page to follow)

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JT McMickle

The forgoing statement was sworn to and
Acknowledged before me this 14
Day of April 2022

Notary Public for Utah
My Commission expires: 5/10/23

NOTARY PUBLIC
JOSIE A HAGEN
COMM. # 706267
COMMISSION EXPIRES
MAY 10, 2023
STATE OF UTAH

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Exhibit E

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Myles Glick Architect LLC
66 Rebellion Road, Charleston, SC
29407
mylesglickarchitectllc@live.com

March 8, 2018

Myles Glick, AIA LEED AP
Myles Glick Architect LLC
66 Rebellion Road
Charleston, South Carolina 29407

Mr. John C. Hayes IV
180 Meeting Street
Suite 305
Charleston, South Carolina 29401

Mr. I. Keith McCarty
McCarty Law Firm
1212 Wappoo Road
P.O. Box 30055
Charleston, South Carolina 29417

Re: Preliminary Report (Non Destructive and Destructive Review)
One Hamlin Place
Hamlin Plantation
Mt. Pleasant, South Carolina

In accordance with the request of the homeowners, the following report is presented to the One Hamlin Place Condominium Association for their review and use.

This report contains the results of the non-destructive reviews and the destructive testing. The non-destructive reviews took place on May 13, 2015, July10, 2015 and August 14, 2017. Additional destructive and additional non-destructive reviews took place on November 2,3, 2017. The exterior of the complex and the interior of one unit (#3013 Mohegan Way) was investigated on August 14, 2017. Nineteen (19) destructive test holes/areas of investigation were made on November 2, 2017 and twenty three (23) test holes on November 3, 2017 with additional interior reviews taking place (units #3077,#2044, #3001, #2020 and #2044).

This report is not a complete analysis of **a**ll building systems (mechanical, electrical, plumbing and structural) but rather a specific review of the building skin (walls) and roof/flashing systems. The review is focused on construction deficiencies that have resulted in water intrusion and building component failure. Additional construction

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

4. At the paneled walls, head flashing immediately above windows is not present and all sealant joints at window/trim intersections do not have the proper gap for a backer rod and sealant joint.
5. The windows are by YKK ap and are double flange single hung solid vinyl windows that do not allow for a proper engineered caulk joint at all trim intersections.
6. Most window and door head flashing is caulked shut.
7. Kick out flashing is missing at appropriate areas

B. Cementitious Siding

The Building Code allows alternative products to be used if they pass a compliance test by a third party testing agency. The cementitious product used at One Hamlin Place is primarily a product by Hardi Plank. In accordance with NER #409, Hardi Plank has been approved for use if it is installed in accordance with the manufacture's installation instructions. If it is not installed in accordance with the manufacture's installation instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-identified at this time. Installation requirements and therefore, construction deficiencies would be the same as Hardie Plank.

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2” ring shank hot dipped galvanized siding nail with a 0.22” nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

References to Hardie Plank are to all cementitious materials in this report. The 2008/09/12 Hardie Plank installation Instructions were published and available. Therefore they would apply to the installation of the Hardie Plank siding at One Hamlin Place. Common to all installation instructions are the following.

1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

C. Windows

After investigating all eleven buildings, it was determined that all windows are solid vinyl single hung with a DP of 50. They are not impact resistant windows. The

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Exhibit F

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME I

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Friday, March 8, 2019

TIME: 10:07 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

* * * * * * * * * * * * * * * * *

Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

A. Pull out capacity.

Q. Gotcha. What is the other issue?

A. And then the spacing between the -- is more than 16 inches, and these studs are 16 inches on this building. And then all the pictures surrounding it illustrate the same thing. It's a long board. And then 21 actually is the HardiePlank label, so it is HardiePlank. 22, it's nailed too close to the butt joint. And almost on an inch; it's 7/8ths. So it's fairly close, but it's just too close to the edge. It should be an inch. It's 3/8ths. There's just not a holding power of the board left.

Q. Let me direct your attention to 32. We're now back to building 1. I think we talked earlier in the deposition that here the water intrusion that you can document with the -- is that -- in 32 and 33, am I seeing sealant splitting, or is that something else I'm looking at?

A. No, you're right. That's the sealant splitting. This is the end unit. I believe this window we're looking at is over the brick facade, which kind of goes up a little bit. This is the unit that Andrew was referring to. But you're

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME II

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Monday, March 11, 2019

TIME: 9:15 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

* * * * * * * * * * * * * * * * *

Electronically signed by Eve Wilbanks (101-177-349-6970) 2caf5fd7-7266-43f7-9313-090df8197876

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

interpreting that; you're going to adopt what Russ says about that?

A. Yes, I'll defer to Russ. It's a structural issue.

Q. But your opinion is that the siding needs to be replaced?

A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Q. You were asked some questions and shown photographs of the -- I think it's been described as the white panels that were installed typically on the rear of the buildings with the flat roofs, correct?

A. Correct. They were also on bay windows on the sides, and they're also on the siding when some of the back areas turned the corner, as we saw on that very first unit. When you go in the project, with the brick facade, there's at least 12 feet of those panels that wrap the corner.

Q. Are any of those panel constructions on buildings 2, 4 or 6, which are the buildings with the sloped roofs?

A. I would have to go back and see if there's any bay windows on there.

Electronically signed by Eve Wilbanks (101-177-349-6970) 2caf5fd7-7266-43f7-9313-090df8197876

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Exhibit G

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,	)	
Plaintiff,	)	
-versus-	)	Case No.: 2017-CP-10-5245
JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., et al.,	)	
Defendants.	)	

THE DEPOSITION OF RUSSELL T. MEASE was taken as a witness on behalf of the Defendants, pursuant to South Carolina Rules of Civil Procedure, at 10:00 a.m. on Thursday, the 14th day of March 2019, at the offices of Robertson Hollingsworth Manos & Rahn, 550 King Street, Suite 300, Charleston, South Carolina, before Janice O. Darby, Registered Professional Reporter and Notary Public in and for the State of South Carolina.

Janice Ohlendorf Darby, RPR
(843) 814-7666 jodarby@comcast.net

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Q I understand. Just because other contractors may have done it in the community doesn't make it so, and you wouldn't rely on what other contractors may have done to support a opinion to a reasonable degree of engineering certainty as to what the contractors did in this case. Correct?

A True. But I'm relying on Mr. Glick and his evaluation of the property and him relaying to me that they were the typical nail that was used.

Q I understand. So again, the basis of your opinion that the fasteners used at all 11 buildings on this project on the HardiePlank were improper is based on six nails we see in DT 33 and photo 72 of Exhibit 36 and that Mr. Glick, the other primary expert in this case that did the investigation, told you that that's what he saw as being out on the project?

A Correct.

Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

used?

A Yes. That's the second part of item two under Recommendations where I document that condition.

Q So you note, "The use of improper fasteners will negatively affect the ability of the siding to resist wind loading."

A Yes. Mr. Glick gave other reasons also for needing to remove the siding, but mine is a supporting element to that recommendation.

Q And we talked about the fasteners used, and I know this is probably an over-generalization. But when we looked at that chart, assuming Mr. Glick was accurate and we do have the siding nails out there instead of the roofing nails, those generally are only sufficient up to about 80 miles an hour is what that chart told us?

A I think it was 70 at a 40-foot height, but yes.

Q I don't know that it matters, but just to make sure that I'm accurate as to what I was looking at, if we go back to page 27 of NER 405.

A Yes. A 40-foot height is 70 miles an hour.

Q Are there any other components or

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Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON Gary Keisler, individually and as Class Representative, John Does (1-50) and Jane Does (1-50), Plaintiffs vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 AFFIDAVIT OF JT MCMICKLE

PERSONALLY APPEARED before me, JT McMickle who, being first duly sworn, deposes and says:

1. I am over 18 years of age and otherwise competent to provide this affidavit and the testimony herein.

2. I served as Chief Financial Officer for RP Falcon Properties, LLC f/k/a JW Homes, LLC ("JW Homes") during the time of construction of Buildings 5 through 11 of

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

the One Hamlin Townhome project (hereinafter collectively referred to, for convenience and purposes of this affidavit only, as "One Hamlin Phase II").

3. That JW Homes did not self-perform work at One Hamlin Phase II.

4. That subcontractors were paid to perform the work at One Hamlin Phase II.

5. I have personal knowledge of the business records of JW Homes.

6. That the purchase orders and invoices produced by JW Homes are part of the business records of JW Homes.

7. That the purchase orders and invoices produced by JW Homes in this case are kept in the regular course of JW Homes' business.

8. That it was the regular practice of JW Homes to create the purchase orders invoices at or about the time the work described on the purchase orders or invoices was performed.

9. That based on my review of the business records of JW Homes for One Hamlin Phase II, All Exteriors Construction, LLC ("All Exteriors") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5, 7, 8, 9, 10, and 11, including the siding installation at buildings 7-11 of One Hamlin Phase II.

10. That based on my review of the business records of JW Homes for One Hamlin Phase II, Jorge Medina, And Jorge Medina A/K/A JMC Construction, LLC A/K/A JMC Construction, Inc.'s ("JMC") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5 and 6 of One Hamlin Phase II, including the installation of the siding at Buildings 5 and 6.

Further, AFFIANT SAYETH NOT.

(Signature page to follow)

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

JT McMickle

The forgoing statement was sworn to and
Acknowledged before me this 14
Day of April 2022

Notary Public for Utah
My Commission expires: 5/10/23

NOTARY PUBLIC
JOSIE A HAGEN
COMM. # 706267
COMMISSION EXPIRES
MAY 10, 2023
STATE OF UTAH

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Myles Glick Architect LLC
66 Rebellion Road, Charleston, SC
29407
mylesglickarchitectllc@live.com

March 8, 2018

Myles Glick, AIA LEED AP
Myles Glick Architect LLC
66 Rebellion Road
Charleston, South Carolina 29407

Mr. John C. Hayes IV
180 Meeting Street
Suite 305
Charleston, South Carolina 29401

Mr. I. Keith McCarty
McCarty Law Firm
1212 Wappoo Road
P.O. Box 30055
Charleston, South Carolina 29417

Re: Preliminary Report (Non Destructive and Destructive Review)
One Hamlin Place
Hamlin Plantation
Mt. Pleasant, South Carolina

In accordance with the request of the homeowners, the following report is presented to the One Hamlin Place Condominium Association for their review and use.

This report contains the results of the non-destructive reviews and the destructive testing. The non-destructive reviews took place on May 13, 2015, July10, 2015 and August 14, 2017. Additional destructive and additional non-destructive reviews took place on November 2,3, 2017. The exterior of the complex and the interior of one unit (#3013 Mohegan Way) was investigated on August 14, 2017. Nineteen (19) destructive test holes/areas of investigation were made on November 2, 2017 and twenty three (23) test holes on November 3, 2017 with additional interior reviews taking place (units #3077,#2044, #3001, #2020 and #2044).

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ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

4. At the paneled walls, head flashing immediately above windows is not present and all sealant joints at window/trim intersections do not have the proper gap for a backer rod and sealant joint.
5. The windows are by YKK ap and are double flange single hung solid vinyl windows that do not allow for a proper engineered caulk joint at all trim intersections.
6. Most window and door head flashing is caulked shut.
7. Kick out flashing is missing at appropriate areas

B. Cementitious Siding

The Building Code allows alternative products to be used if they pass a compliance test by a third party testing agency. The cementitious product used at One Hamlin Place is primarily a product by Hardi Plank. In accordance with NER #409, Hardi Plank has been approved for use if it is installed in accordance with the manufacture's installation instructions. If it is not installed in accordance with the manufacture's installation instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-identified at this time. Installation requirements and therefore, construction deficiencies would be the same as Hardie Plank.

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2” ring shank hot dipped galvanized siding nail with a 0.22” nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

References to Hardie Plank are to all cementitious materials in this report. The 2008/09/12 Hardie Plank installation Instructions were published and available. Therefore they would apply to the installation of the Hardie Plank siding at One Hamlin Place. Common to all installation instructions are the following.

1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

C. Windows

After investigating all eleven buildings, it was determined that all windows are solid vinyl single hung with a DP of 50. They are not impact resistant windows. The

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME I

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Friday, March 8, 2019

TIME: 10:07 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

* * * * * * * * * * * * * * * * *

Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

A. Pull out capacity.

Q. Gotcha. What is the other issue?

A. And then the spacing between the -- is more than 16 inches, and these studs are 16 inches on this building. And then all the pictures surrounding it illustrate the same thing. It's a long board. And then 21 actually is the HardiePlank label, so it is HardiePlank. 22, it's nailed too close to the butt joint. And almost on an inch; it's 7/8ths. So it's fairly close, but it's just too close to the edge. It should be an inch. It's 3/8ths. There's just not a holding power of the board left.

Q. Let me direct your attention to 32. We're now back to building 1. I think we talked earlier in the deposition that here the water intrusion that you can document with the -- is that -- in 32 and 33, am I seeing sealant splitting, or is that something else I'm looking at?

A. No, you're right. That's the sealant splitting. This is the end unit. I believe this window we're looking at is over the brick facade, which kind of goes up a little bit. This is the unit that Andrew was referring to. But you're

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME II

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Monday, March 11, 2019

TIME: 9:15 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

* * * * * * * * * * * * * * * * *

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Electronically signed by Eve Wilbanks (101-177-349-6970) 2caf5fd7-7266-43f7-9313-090df8197876

interpreting that; you're going to adopt what Russ says about that?

A. Yes, I'll defer to Russ. It's a structural issue.

Q. But your opinion is that the siding needs to be replaced?

A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Q. You were asked some questions and shown photographs of the -- I think it's been described as the white panels that were installed typically on the rear of the buildings with the flat roofs, correct?

A. Correct. They were also on bay windows on the sides, and they're also on the siding when some of the back areas turned the corner, as we saw on that very first unit. When you go in the project, with the brick facade, there's at least 12 feet of those panels that wrap the corner.

Q. Are any of those panel constructions on buildings 2, 4 or 6, which are the buildings with the sloped roofs?

A. I would have to go back and see if there's any bay windows on there.

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Electronically signed by Eve Wilbanks (101-177-349-6970) 2caf5fd7-7266-43f7-9313-090df8197876

ELECTRONICALLY FILED - 2022 May 02 3:55 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,	)	
Plaintiff,	)	
-versus-	)	Case No.: 2017-CP-10-5245
JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., et al.,	)	
Defendants.	)	

THE DEPOSITION OF RUSSELL T. MEASE was taken as a witness on behalf of the Defendants, pursuant to South Carolina Rules of Civil Procedure, at 10:00 a.m. on Thursday, the 14th day of March 2019, at the offices of Robertson Hollingsworth Manos & Rahn, 550 King Street, Suite 300, Charleston, South Carolina, before Janice O. Darby, Registered Professional Reporter and Notary Public in and for the State of South Carolina.

Janice Ohlendorf Darby, RPR
(843) 814-7666 jodarby@comcast.net

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

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Q I understand. Just because other contractors may have done it in the community doesn't make it so, and you wouldn't rely on what other contractors may have done to support a opinion to a reasonable degree of engineering certainty as to what the contractors did in this case. Correct?

A True. But I'm relying on Mr. Glick and his evaluation of the property and him relaying to me that they were the typical nail that was used.

Q I understand. So again, the basis of your opinion that the fasteners used at all 11 buildings on this project on the HardiePlank were improper is based on six nails we see in DT 33 and photo 72 of Exhibit 36 and that Mr. Glick, the other primary expert in this case that did the investigation, told you that that's what he saw as being out on the project?

A Correct.

Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

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used?

A Yes. That's the second part of item two under Recommendations where I document that condition.

Q So you note, "The use of improper fasteners will negatively affect the ability of the siding to resist wind loading."

A Yes. Mr. Glick gave other reasons also for needing to remove the siding, but mine is a supporting element to that recommendation.

Q And we talked about the fasteners used, and I know this is probably an over-generalization. But when we looked at that chart, assuming Mr. Glick was accurate and we do have the siding nails out there instead of the roofing nails, those generally are only sufficient up to about 80 miles an hour is what that chart told us?

A I think it was 70 at a 40-foot height, but yes.

Q I don't know that it matters, but just to make sure that I'm accurate as to what I was looking at, if we go back to page 27 of NER 405.

A Yes. A 40-foot height is 70 miles an hour.

Q Are there any other components or

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Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON One Hamlin Place Townhome Association, Inc., Plaintiff vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05245 RP FALCON PROPERTIES, LLC F/K/A JW HOMES, LLC, RP FALCON LAND, LLC, F/K/A JW LAND INVESTMENT, LLC, RP FALCON REALTY, LLC, F/K/A WIELAND REALTY, LLC, AND RESIDENTIAL PARTNERS, LLC **NOTICE OF MOTION AND MOTION TO RECONSIDER** ORDER GRANTING ALL EXTERIORS CONSTRUCTION, LLC'S MOTION FOR SUMMARY JUDGMENT

RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (hereinafter collectively referred to, for convenience and purposes of this motion only, as the "RP Companies") hereby moves the Court, pursuant to Rule 59(e) S.C.R.C.P, for an Order altering, amending, or vacating the Order filed April

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

22, 2022, granting All Exteriors Construction, LLC's ("All Exteriors") Motion for Summary Judgment. (A copy of the April 22, 2022 Form 4 Order is attached hereto as "Exhibit A").

Legal Standard

Rule 59 provides that "the court may open the judgment if one has been entered and amend his findings of fact and conclusions of law or make new findings and conclusions and direct the entry of a new judgment." NCNB S.C. v. Floyd, 303 S.C. 261, 263, 399 S.E.2d 794, 795 (Ct. App. 1990). It is proper to view a Rule 59(e) motion not only as a vehicle to request the trial court to "'alter or amend the judgment,' but also as a vehicle to seek 'reconsideration'" of issues and arguments. Elam v. S.C. Dep't of Transp., 361 S.C. 9, 21, 602 S.E.2d 772, 778 (2004).

Background

This is a construction defect action arising out of the construction of 11 townhomes known as One Hamlin Place ("One Hamlin"). RP Falcon Properties, LLC F/K/A JW Homes, LLC ("JW Homes") served as the general contractor for buildings 5 through 11 at One Hamlin Place (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as "One Hamlin Phase II"). All Exteriors was a subcontractor who performed work at buildings 5 and 7 through 11 at One Hamlin Phase II. See invoices and purchase orders reflecting All Exteriors' work at One Hamlin Phase II ("Exhibit B") and All Exteriors' Memorandum in Support of its Motion for Summary Judgment at page 5.

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Plaintiff filed this action against the RP Companies[1], among others, alleging deficiencies in the construction of the townhomes at One Hamlin. The RP Companies answered the Plaintiff's complaint denying liability and filing cross-claims and a third-party complaint seeking indemnity from various subcontractors who performed the work at One Hamlin Phase II, alleging that these subcontractors must identify the RP Companies if and to the extent that the RP Companies are found liable to Plaintiff for damages relating to the subcontractors' work. All Exteriors moved for summary judgment on March 3, 2022, and the RP Companies subsequently filed a Memorandum in Opposition to All Exteriors' Motion. See the RP Companies Memorandum in Opposition ("Exhibit C") and incorporated herein by reference. Oral argument was held on April 18, 2022 and on April 22, 2022 the Court entered a Form 4 Order granting All Exteriors' Motion for Summary Judgment.

Argument

The Court's Form 4 Order did not make findings of fact or conclusions of law addressing the RP Companies' arguments in opposition to All Exteriors' Motion for Summary Judgment. Accordingly, the RP Companies respectfully request the Court reconsider the RP Companies' arguments and enter an Order denying All Exteriors' Motion for Summary Judgment.

[1] Plaintiff alleges a theory of amalgamation against JW Homes and other entities, including the RP Companies, relating to a series of transactions that occurred between 2009 through 2012. Plaintiff claims that these entities and a number of others are amalgamated and that for purposes of any judgment that may be rendered in favor of the Plaintiff, these entities should be treated as a single business enterprise. Therefore, while RP Falcon Properties, LLC F/K/A JW Homes, LLC was the general contractor for One Hamlin Phase II, for the purposes of this motion, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (the "RP Companies") are each entitled to indemnity to the extent that Plaintiff proves they are amalgamated.

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

The basis for All Exteriors' Motion for Summary Judgment was two-fold. First, All Exteriors argued that the RP Companies cannot pursue an action for equitable indemnity based on an alleged "negligence rule" that prevents joint tortfeasors from recovering from one another under a claim for equitable indemnity. Second, All Exteriors argued that the RP Companies' claims for negligence, breach of contract, and breach of warranty were merely disguised claims for indemnity. In its Memorandum in Opposition and at oral argument, the RP Companies presented arguments supported by significant factual evidence, including the affidavit of JT McMickle, evidence of All Exteriors' work on the property, excerpts of Plaintiff's expert reports, and testimony from Plaintiff's experts. See Exhibits B – G. This evidence, coupled with on-point case law, created a question of fact as to whether the RP Companies necessarily share in the fault of the alleged defective work performed by All Exteriors at One Hamlin Phase II.

The Court's decision to grant summary judgment to All Exteriors did not recognize the inherent issue OF FACT that exists in the determination of whether the RP Companies were without fault in this matter. The submission by All Exteriors, which consisted of an excerpt from a deposition of a contractor that acknowledges that a general contractor has obligations relative to construction, did not and does not support the notion that there is no question of fact as to whether the RP Companies could be found by the fact finder to be without fault in this case. The deposition testimony cited by All Exteriors does not establish the duty of a general contractor nor its breach. As argued at the hearing and as discussed in detail in the RP Companies' briefs, the South Carolina Appellate Courts determine the duties owed in this matter, and have unequivocally stated that a general

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

contractor does not automatically become liable for the negligent acts of its subcontractors merely be virtue of the general contractor/subcontractor relationship.

In addition, the Court's Form 4 Order did not recognize that the RP Companies had presented evidence, and certainly at least "a scintilla" of evidence, warranting a determination by the fact finder in favor of the RP Companies' on their claims for indemnity, breach of contract, breach of warranty, and negligence against All Exteriors. Anders v. South Carolina Farm Bureau Mut. Ins. Co. 307 S.C. 371, 375, 415 S.E.2d 406, 408 (Ct. App. 1992)(At the summary judgment stage it is only necessary for the nonmoving party to submit a scintilla of evidence warranting a determination by the jury). Furthermore, the Court did not take into consideration rulings from the South Carolina Supreme Court and South Carolina Court of Appeals, that make clear that under South Carolina law a general contractor is not automatically responsible for the fault of defective work put in place by its subcontractors.[2] Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80, 89 (2008)(rejecting the argument that a general contractor is automatically responsible for the negligence of its subcontractors); See also Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

Conclusion

In light of the foregoing, the RP Companies respectfully request that the Court reconsider its prior decision and alter, amend, and/or withdraw its Order granting All Exteriors' Motion for Summary Judgment and enter an Order denying All Exteriors' Motion for Summary Judgment.

[2] These cases were cited by the RP Companies in their Memorandum in Opposition and brought to the Court's attention during oral argument.

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Respectfully submitted,

PARKER POE ADAMS & BERNSTEIN LLP
200 Meeting Street, Suite 301
Charleston, SC 29401

By: s/ Thomas C. Hildebrand, Jr.
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SC Bar # 2501
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W. Greyson Land
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Attorneys for Defendant Residential Partners, LLC

And

By: s/ Blake A. McKie
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Attorneys for Defendants, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC

May 2, 2022

ELECTRONICALLY FILED - 2022 May 22 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005246

FORM 4

STATE OF SOUTH CAROLINA
COUNTY OF Charleston
IN THE COURT OF COMMON PLEAS

JUDGMENT IN A CIVIL CASE

CASE NO. 2017CP1005246

Gary Keisler et al
PLAINTIFF(S)

John Wieland Homes and Neighborhoods of the Carolinas Inc as et al
DEFENDANT(S)

DISPOSITION TYPE (CHECK ONE)

☐ **JURY VERDICT**. This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.

☑ **DECISION BY THE COURT**. This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.

☐ **ACTION DISMISSED** (*CHECK REASON*): ☐ Rule 12(b), SCRCP; ☐ Rule 41(a), SCRCP (Vol. Nonsuit); ☐ Rule 43(k), SCRCP (Settled); ☐ Other

☐ **ACTION STRICKEN** (*CHECK REASON*): ☐ Rule 40(j), SCRCP; ☐ Bankruptcy; ☐ Binding arbitration, subject to right to restore to confirm, vacate or modify arbitration award; ☐ Other

☐ **STAYED DUE TO BANKRUPTCY**

☐ **DISPOSITION OF APPEAL TO THE CIRCUIT COURT** *(CHECK APPLICABLE BOX)*: ☐ Affirmed; ☐ Reversed; ☐ Remanded; ☐ Other

NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING IN THIS APPEAL.

IT IS ORDERED AND ADJUDGED: ☐ See attached order (formal order to follow) ☑ Statement of Judgment by the Court:

This matter came before the Court as JMC Construction, LLC's Motion for Summary Judgment or Motion to Bifurcate Trial heard on April 18, 2022.

Defendant JMC Construction, LLC's Motion for Summary Judgment is granted. The Motion to bifurcate is moot.

ORDER INFORMATION

This order ☐ ends ☑ does not end the case. ☐ See Page 2 for additional information.

For Clerk of Court Office Use Only

This judgment was electronically entered by the Clerk of Court as reflected on the Electronic Time Stamp, and a copy mailed first class to any party not proceeding in the Electronic Filing System on 04/22/2022 .

Chad Hood
Bills Painting
William C Mulhern
Mora Construction LLC
Benjamin Mora Construction LLC
Moras Construction
Mora Construction
Benjamin L Mora
Benjamin Mora
Glenn Clark Construction
Polly S Clark
Anthony Kirksey
Creative Construction
Evans Enterprises
Coy Cy Construction
Residental Partners LLC
Emmanuel Kehagis
A Marc Inc
Gonzalo Guerrero
Alex Welch
Jack Clark Construction LLC
Jack R Clark
Wieland Realty LLC
Rp Falcon Realty LLC
Jw Land Investment LLC
Rp Falcon Land Llc
JW Homes LLC
RP Falcon Properties LLC
AC Construction Corp
Builders Firstsource Southeast Group LLC
AAA Coastline Inc
Andrea DaCosta
Frankcisco DaCosta

NAMES OF TRADITIONAL FILERS SERVED BY MAIL

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Court Reporter:

E-Filing Note: The date of Entry of Judgment is the same date as reflected on the Electronic File Stamp and the clerk's entering of the date of judgment above is not required in those counties. The clerk will mail a copy of the judgment to parties who are not E-Filers or who are appearing pro se. See Rule 77(d), SCRCP.

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Charleston Common Pleas

Case Caption: Gary Keisler , plaintiff, et al VS John Wieland Homes and Neighborhoods of the Carolinas Inc as , defendant, et al

Case Number: 2017CP1005246

Type: Order/Electronic Form 4

IT IS SO ORDERED!

/s Hon. Bentley D. Price, Circuit Judge 2766

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

RECEIVED
FEB 03 2014
JW HOMES, LLC

MEASUREMENT PURCHASE ORDER

Number: 02967961 Date: 9/19/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0014
One Hamlin Place
3057 Monhegan Way
Mt. Pleasant SC 29464

Reverse Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
1sidingtrim	Install all siding includes PT band	sqr	~~12.7000~~ 11.5	170.000	~~2,159.00~~ 3335.00
sccrown	crown mold & frieze	lf	~~92.0000~~ 90	6.500	~~598.00~~ 585.00
scfascia	fascia and soffit	lf	~~92.0000~~ 90	8.500	~~782.00~~ 765.00
scpedimentbi	pediment build & install	each	~~0.0000~~ 2	70.000	~~0.00~~ 140.00

Sub-Total ~~3,559.00~~
Sales Tax 0.00
Total Amt ~~3,539.00~~ 4825.00

Authorized Signature:
By:
Title:
Date:
PAYMENT APPROVED BY DOUG PILCHER ASSOC. SIG. BUILDER

Vendor\Sub-Contractor:
By:
Title:
Date: 1/20/14

Approved For Payment:
By: PAYMENT APPROVED BY
Title: SCOTT PARKER
Date: CONSTRUCTION MANAGER

[redacted]

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST CHARLESTON

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95135617

Vendor/Trade Partner: all Ext, llc		Neighborhood/Lot/Block: OHPT one hamlin place #14	
Vendor Number: (Must have vendor number for payment) +0795		Activity Number: (Only one activity number per VPO) 33700	Activity Description:
Vendor/Trade Partner Phone Number:	Date: 1/20/14	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
Work per invoice 187	x $	=	3290.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST-CHARLESTON

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

dawg

Subtotal: X

Sales Tax:

ELIMINATE THE VARIANCE!

VPO Total Amount: $ 3290.00

Builder Signature: PAYMENT APPROVED BY DOUG PILCHER ASSOC. SIG. BUILDER

by: _____

Vendor/Trade Partner Signature:

by: _____

Neighborhood Manager: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER

by: _____

Distribution: White – Accounting Yellow – Trade Partner

321090213

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

RECEIVED
FEB 03 2014
JW HOMES, LLC

MEASUREMENT PURCHASE ORDER

Number: 02967974 Date: 9/19/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0015
One Hamlin Place
3061 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1
Will Call To Verify Ship Date.
Est Date Required:
Superintendent: FORREST CHIP COOPER JR

F.O.B.:
Payment Terms: Weekly Trades
Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
0NOTEALIST	PO is for entire scope of work. VPOs will not be accepted	note	0.0000	0.000	0.00
1sidingtrim	Install all siding includes PT band	sqr	~~28.0000~~ 22	170.000	~~4,760.00~~ 6380.00
scbaywnddbl	double bay window	each	1.0000	500.000	500.00 ✓
sccrown	crown mold & frieze	lf	~~157.0000~~ 152	6.500	~~1,020.50~~ 988.00
scfascia	fascia and soffit	lf	~~157.0000~~ 152	8.500	~~1,334.50~~ 1292.00
scpedimentbl	pediment build & install	each	~~0.0000~~	70.000	~~0.00~~ 840.00

Sub-Total	~~7,514.50~~
Sales Tax	0.00
Total Amt	~~7,613.00~~ 10,000.00

PAYMENT APPROVED BY JAMES HUFFMAN VP COLLY-CHARLESTON

Authorized Signature:
By: PAYMENT APPROVED BY DOUG FLETCHER
Title: ASSOC. VIS. BUILDER
Date: 1/7

Vendor\Sub-Contractor:
By:
Title:
Date: 1/20/14

Approved For Payment:
By:
Title: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER
Date:

Close

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order 95135615

Vendor/Trade Partner:		Neighborhood/Lot/Block: OHP-T
all Ext., LLC		one hamlin place #15
Vendor Number: (Must have vendor number for payment)		Activity Number: (Only one activity number per VPO)
t0795		~~33~~ 33700
Vendor/Trade Partner Phone Number:	Date: 1/20/14	Original Budget:
		Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 188	x $	=	3150.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

dsw g

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST CHARLESTON

Subtotal:

Sales Tax: X

ELIMINATE THE VARIANCE!

VPO Total Amount: $ 3150.00

Builder Signature: PAYMENT APPROVED BY DOUG PRICHER ASSOC SIG BUILDER
by: _____

Vendor/Trade Partner Signature:
by: _____

Neighborhood Manager:
by: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER

Distribution: White – Accounting Yellow – Trade Partner

321090213

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
1/20/2014	188

Bill To

JW HOMES, LLC
CHARLESTON DIVISION
P.O. BOX 87514
Atlanta, GA 30337

Ship To

one hamlin place
unit # 15
monhegan way

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
02967974			1/20/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
22	ns	siding	290.00	6,380.00
152	ch	cornice/hardi	8.50	1,292.00
152	fr	frieze	6.50	988.00
100	ba	bandboard	6.00	600.00
12	ped	pediments	70.00	840.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00
1	bd	bay/double	500.00	500.00

Total $13,150.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

RECEIVED
APR 28 2014
JW HOMES, LLC

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS

P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95134542

Vendor/Trade Partner:		Neighborhood/Lot/Block:	
all ext. llc		OHP-T Hermegan way one hamlin place unit 16	
Vendor Number: (Must have vendor number for payment) t0795		Activity Number: (Only one activity number per VPO) 33100	Activity Description:
Vendor/Trade Partner Phone Number:	Date: 4/29/14	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 306	x $	=	13,155.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

chip

Subtotal: X

Sales Tax:

ELIMINATE THE VARIANCE!

PAYMENT APPROVED BY
JAMES PARTIN
VP CONST. CHARLESTON
VPO Total Amount: $ 13,155.00

Purchaser Signature:

PAYMENT APPROVED BY
CHRIS COSTA
SIGNATURE ON FILE

by: _____

Vendor/Trade Partner Signature:

by: _____

Neighborhood Manager:

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

by: _____

Distribution: White – Accounting Yellow – Trade Partner

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
4/28/2014	306

Bill To

JW HOMES, LLC
CHARLESTON DIVISION
P.O. BOX 87514
Atlanta, GA 30337

Ship To

one hamlin place
unit # 16

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134542			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
25	ns	siding	290.00	7,250.00
135	ch	cornice/hardi	8.50	1,147.50
135	fr	frieze	6.50	877.50
13	ped	pediments	70.00	910.00
70	ba	bandboard	6.00	420.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $13,155.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON COMMON PLEAS - CASE#2017CP1005245

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
4/28/2014	307

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 17

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134543			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
18	ns	siding	290.00	5,220.00
85	ch	cornice/hardi	8.50	722.50
85	fr	frieze	6.50	552.50
40	ba	bandboard	6.00	240.00
2	ped	pediments	70.00	140.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $9,925.00

Invoice

xteriors Construction LLC
4116 meeting st
SC 29405

Date	Invoice #
4/28/2014	308

Bill To

JW HOMES, LLC
CHARLESTON DIVISION
P.O. BOX 87514
Atlanta, GA 30337

Ship To

one hamlin place
unit # 18

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134544			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
17	ns	siding	290.00	4,930.00
70	ch	cornice/hardi	8.50	595.00
70	fr	frieze	6.50	455.00
20	ba	bandboard	6.00	120.00
7	ped	pediments	70.00	490.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,140.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95134593

Vendor/Trade Partner:		Neighborhood/Lot/Block:	
all Ext, llc		OHP unit 19 3074 Monegan Way	
Vendor Number: (Must have vendor number for payment) t0795		Activity Number: (Only one activity number per VPO) 33450	Activity Description:
Vendor/Trade Partner Phone Number:	Date:	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 371	x $	=	14,517.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

doug

ELIMINATE THE VARIANCE!

Subtotal:

Sales Tax: X

VPO Total Amount: $ 14,517.00

Builder Signature:
PAYMENT APPROVED BY
DOUG PILCHER
SIGNATURE BUILDER
by: _____

Vendor/Trade Partner Signature:
by: _____

Neighborhood Manager:
PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER
by: _____

Distribution: White – Accounting Yellow – Trade Partner

321090213

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2022CP1002245

Invoice

...riors Construction LLC
...6 meeting st
...SC 29405

Date	Invoice #
7/22/2014	371

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 19

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134593			7/22/2014			

Quantity	Item Code	Description	Price Each	Amount
	fp	Front Porch	0.00	0.00
6	np	set post	35.00	210.00
40	sh	standard handrails	18.00	720.00
0.36	c/s	ceiling soffit	275.00	99.00
16	wr	wrap porch beam	28.00	448.00
16	hb	porch hardi trim bandboard	7.00	112.00
28	l	landing	6.50	182.00
16	vl	large vents	260.00	4,160.00
1	a66	a/c stand	325.00	325.00
2	nc	set columns	75.00	150.00
10	s35	stairs 3 ' - 5'	50.00	500.00
	BP	Back Porch	0.00	0.00
42	sh	standard handrails	18.00	756.00
5.04	c/s	ceiling soffit	275.00	1,386.00
90	bac	back porch beam	16.00	1,440.00
10	66	6 x 6 laminated box column	110.00	1,100.00
21	hb	porch hardi trim bandboard	7.00	147.00
	GP	Garage Porch	0.00	0.00
1	np	set post	35.00	35.00
4	sh	standard handrails	18.00	72.00
1	a66	a/c stand	325.00	325.00
11	s35	stairs 3 ' - 5'	50.00	550.00
1	gdtio	garage door trim	180.00	180.00
24	wsb	wrap steel beam W/hardi stucco panels	25.00	600.00
1	fgdo	frame garage door opening	270.00	270.00
1	14gl	add 1 x 4 tky @ garage level	750.00	750.00

Total $14,517.00

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

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APR 29 2014
JW HOMES, LLC

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Variance Purchase Order

95134545

Vendor/Trade Partner:		Neighborhood/Lot/Block:	
all ext., LLC		OHP-T 19 one hamlin place unit 19	
Vendor Number: (Must have vendor number for payment)		Activity Number: (Only one activity number per VPO)	Activity Description:
T0795		33700	
Vendor/Trade Partner Phone Number:	Date:	Original Budget:	Paid to Date:
	4/29/14		

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 309	x $	=	14,225.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

Chip

ELIMINATE THE VARIANCE!

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST CHARLESTON

Subtotal:	X
Sales Tax:	X
VPO Total Amount:	$ 14,225.00

Builder Signature:
PAYMENT APPROVED BY CHIP COOPER SIGNATURE ON FILE
by: _____ 4/29/14

Vendor/Trade Partner Signature:
by: _____

Neighborhood Manager:
PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER
by: _____

Distribution: White – Accounting Yellow – Trade Partner

[redacted] Exteriors Construction LLC
4116 meeting st
SC 29405

Invoice

Date	Invoice #
4/28/2014	309

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 19

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134545			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
26	ns	siding	290.00	7,540.00
155	ch	cornice/hardi	8.50	1,317.50
155	fr	frieze	6.50	1,007.50
90	ba	bandboard	6.00	540.00
11	ped	pediments	70.00	770.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $14,225.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	388

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 20

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136100			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
21.86	ns	siding front (6.60 right (13.46 left (0 back (1.8	290.00	6,339.40
133	ncm	metal fascia front (44 right (65 left (0 back (24	8.50	1,130.50
133	ncr	frieze front (44 right (65 left (0 back (24	4.00	532.00
67	ba	bandboard front (0 right (52 left (0 back (15	7.00	469.00
15	ped	pediments front (7 right (8	70.00	1,050.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $12,070.90

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	389

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 21

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136101			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
11.2	ns	siding front (4.60 back (6,6	290.00	3,248.00
84	ncm	metal fascia front (60 back (24	8.50	714.00
84	ncr	frieze front (60 back (24	4.00	336.00
39	ba	bandboard front (24 back (15	7.00	273.00
3	ped	pediments front (3	70.00	210.00
1	bd	bay/double	800.00	800.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $8,131.00

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ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON COMMON PLEAS - CASE#2017CP1005245

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	390

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 22

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136102			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
13.3	ns	siding front (6.70 back (6.6	290.00	3,857.00
68	ncm	metal fascia front (44 back (24	8.50	578.00
68	ncr	frieze front (44 back (24	4.00	272.00
15	ba	bandboard back (15	7.00	105.00
7	ped	pediments front (7	70.00	490.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $7,852.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964498 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0036
One Hamlin Place
2016
Mt. Pleasant SC 29466

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~22.0000~~ 19.5	170.000	~~3,740.00~~	3315.00
scbaywnddbl	double bay window	each	~~1.0000~~ 2	500.000	~~500.00~~	1000.00
sccrown	crown mold & frieze	lf	~~583.0000~~ 150	6.500	~~3,789.50~~	450.00
scfascia	fascia and soffit	lf	~~129.0000~~ 150	8.500	~~1,096.50~~	1050.00

Sub-Total ~~9,126.00~~
Sales Tax 0.00
Total Amt ~~9,126.00~~ 5815.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By:_____
Title:_____
Date: 10/23

PAYMENT APPROVED BY
ADAM JOHNSON
CONSTRUCTION LDS

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	110

Bill To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337

Ship To
one hamlin place unit 36

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
19.5	s	siding	170.00	3,315.00
150	cm	cornice/metal	7.00	1,050.00
150	cr	crown & frieze	3.00	450.00
87	ba	bandboard	6.00	522.00
11	ped	pediments	70.00	770.00
2	bd	bay/double	500.00	1,000.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,657.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

JOHN WIELAND HOMES
AND NEIGHBORHOODS

PURCHASE ORDER

Number: 02964501 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0037
One Hamlin Place
2020
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

Est Date Required:

F.O.B.:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~16.0000~~ 12.5	170.000	~~2,720.00~~	2125.00
sccrown	crown mold & frieze	lf	~~60.0000~~ 69	6.500	~~390.00~~	207.00
scfascia	fascia and soffit	lf	~~26.0000~~ 69	8.500	~~221.00~~	483.00

Sub-Total ~~3,331.00~~
Sales Tax 0.00
Total Amt ~~3,331.00~~ 2815.00

Authorized Signature:
By:
Title:
Date:

Vendor\Sub-Contractor:
By: J. Medina
Title:
Date:

Approved For Payment:
By:
Title: PAYMENT APPROVED BY ADAM JOHNSON CONSTRUCTION-EMS
Date: 10/3

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	112

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 37

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
12.5	s	siding	170.00	2,125.00
69	cm	cornice/metal	7.00	483.00
69	cr	crown & frieze	3.00	207.00
15	ba	bandboard	6.00	90.00
7	ped	pediments	70.00	490.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $6,445.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964504 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0038
One Hamlin Place
2024
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~22.0000~~ 10.5	170.000	~~3,740.00~~	1785.00
scbaywnddbl	double bay window	each	~~1.0000~~ 2	500.000	~~500.00~~	1000.00
sccrown	crown mold & frieze	lf	~~66.0000~~ 81	6.500	~~429.00~~	243.00
scfascia	fascia and soffit	lf	~~133.0000~~ 81	8.500	~~1,130.50~~	567.00

Sub-Total ~~5,799.50~~
Sales Tax 0.00
Total Amt ~~5,799.50~~ 3595.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By: M
PAYMENT APPROVED BY
ADAM JOHNSON
Title: WILSONS CONSTRUCTION CMS
Date: 10/29

http://homelink.jwhomes.com/OnLinePOs/ViewPO.asp?PONumber=02964504 9/18/2013

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	113

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 38

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
10.5	s	siding	170.00	1,785.00
81	cm	cornice/metal	7.00	567.00
81	cr	crown & frieze	3.00	243.00
2	bd	bay/double	500.00	1,000.00
36	ba	bandboard	6.00	216.00
3	ped	pediments	70.00	210.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $6,571.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964507 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0039
One Hamlin Place
2028 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

Est Date Required:

F.O.B.:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~22.0000~~ 21.5	170.000	~~3,740.00~~	3655.00
sccrown	crown mold & frieze	lf	~~583.0000~~ 136	6.500	~~3,789.50~~	408.00
scfascia	fascia and soffit	lf	~~129.0000~~ 136	8.500	~~1,096.50~~	952.00

Sub-Total ~~8,626.00~~
Sales Tax 0.00
Total Amt ~~8,626.00~~ 5015.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By: M
Title: PAYMENT APPROVED BY ... VP CONSTRUCTION-CHS
Date: 10/2

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	111

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 39

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
21.5	s	siding	170.00	3,655.00
136	cm	cornice/metal	7.00	952.00
136	cr	crown & frieze	3.00	408.00
67	ba	bandboard	6.00	402.00
14	ped	pediments	70.00	980.00
1	bd	bay/double	500.00	500.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,447.00

RECORDED ELECTRONICALLY

Charleston - Construction

M E A S U R E M E N T P U R C H A S E O R D E R

Number: 03088754 Date: 01/30/2015

For: (33700) Siding/Cornice Labor

Plan Details
Willingha1 Willingham (chs)
STANDARD
Revised: __/__/____

Lot/Block
/

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON, SC 29405

Ship To: ohp-t/000/0042
One Hamlin Place
2040 Amenity Park Drive
Mt. Pleasant, SC 29464

Group: 720
CO: 000
Contract: CHS
F.O.B.:
Ship Via:
Will Call To Verify Ship Date
Payment Terms: Weekly Trades
Date Required: 03/05/2014 (Estimated)
Phone:
Superintendent: DOUGLAS PILCHER

Resource/Use	Description	Unit	Quantity	Price	Extension
1detailwall	Detailed Wall	each	1.0000	1,350.000	1,350.00
1parapet	Parapet Wall	ea	1.0000	1,200.000	1,200.00
1sidingtrim	Install all siding includes PT band	sqr	17.0000	290.000	4,930.00
band board	band board	lf	37.0000	7.000	259.00
scbaydbldet	Double Bay Window Detailed	ea	1.0000	900.000	900.00
crown	crown mold & frieze	lf	94.0000	4.000	376.00
ascia	fascia and soffit	lf	94.0000	8.500	799.00
scpedimentbi	pediment build & install	each	3.0000	70.000	210.00

Sub-Total	10,024.00
Sales Tax	0.00
Total Amt	10,024.00

Authorized Signature:
By: _____
Title: PAYMENT APPROVED BY DOUG PILCHER SIGNATURE BUILDER
Date: _____

Vendor/Sub-Contractor:
By: _____
Title: _____
Date: _____

Approved For Payment:
By: _____
Title: PAYMENT APPROVED BY SCOTT BAKER CONSTRUCTION MANAGER
Date: _____

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

RECORD ON APPEAL

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
7/22/2014	362

03088754

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 42

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134570			7/22/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
17	ns	siding front (740 back (960	290.00	4,930.00
94	cm	cornice/metal front n(70 back (24	8.50	799.00
94	cr	crown & frieze front (70 back (24	4.00	376.00
37	ba	bandboard front (22 back (15	7.00	259.00
3	ped	pediments front (3	70.00	210.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00
1	bd	baywindow double detailed	900.00	900.00

Total $10,024.00

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Charleston - Construction

MEASUREMENT PURCHASE ORDER

Number: 03088743 Date: 01/30/2015

For: (33700) Siding/Cornice Labor

Plan Details
Willingha1 Willingham (chs)
STANDARD Revised: __/__/__

Lot/Block /

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON, SC 29405

Ship To: ohp-t/000/0043
One Hamlin Place
2044 Amenity Park Drive
Mt. Pleasant, SC 29464

Group: 720 CO: 000 Contract: CHS
Will Call To Verify Ship Date F.O.B.: Ship Via:
Date Required: 03/05/2014 (Estimated) Payment Terms: Weekly Trades
Superintendent: DOUGLAS PILCHER Phone:

Resource/Use	Description	Unit	Quantity	Price	Extension
1detailwall	Detailed Wall	each	1.0000	1,350.000	1,350.00
1parapet	Parapet Wall	ea	1.0000	1,200.000	1,200.00
1sidingtrim	Install all siding includes PT band	sqr	24.0000	290.000	6,960.00
band board	band board	lf	67.0000	7.000	469.00
sccrown	crown mold & frieze	lf	134.0000	4.000	536.00
scfascia	fascia and soffit	lf	134.0000	8.500	1,139.00
sc-edimentbi	pediment build & install	each	15.0000	70.000	1,050.00

Sub-Total	12,704.00
Sales Tax	0.00
Total Amt	12,704.00

Authorized Signature:
By: _____
Title: PAYMENT APPROVED BY DOUG PILCHER SIGNATURE REQ'D
Date: _____

Vendor/Sub-Contractor:
By: _____
Title: _____
Date: _____

Approved For Payment:
By: _____
Title: SCOTT PARKER CONSTRUCTION MANAGER
Date: _____

RECORD ON APPEAL 1220

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
7/22/2014	363

03088743

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 43

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134571			7/22/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
24	ns	siding front (660 right (1380 back (360	290.00	6,960.00
134	cm	cornice/metal front (44 right (66 back (24	8.50	1,139.00
134	cr	crown & frieze front (44 right (66 back (24	4.00	536.00
67	ba	bandboard right (52 back (15	7.00	469.00
15	ped	pediments front (7 right (8	70.00	1,050.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Nothing paid to 33700- siding

Total $12,704.00

RP COMPANIES 007671

ELECTRONICALLY FILED - 2022 May 02 3:34 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON One Hamlin Place Townhome Association, Inc., Plaintiff vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05245 RP FALCON PROPERTIES, LLC F/K/A JW HOMES, LLC, RP FALCON LAND, LLC, F/K/A JW LAND INVESTMENT, LLC, RP FALCON REALTY, LLC, F/K/A WIELAND REALTY, LLC, AND RESIDENTIAL PARTNERS, LLC MEMORANDUM IN OPPOSITION TO ALL EXTERIORS CONSTRUCTION, LLC'S MOTION FOR SUMMARY JUDGMENT

RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as the "RP Companies") hereby submit this memorandum in opposition to Defendant All Exteriors Construction, LLC's ("All Exteriors") Motion for Summary Judgment.

ELECTRONICALLY FILED - 2022 May 02 3:34 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Introduction

This is a motion for summary judgment by a subcontractor against a general contractor on the general contractor's claims for equitable indemnity. This motion should be denied as under South Carolina law a general contractor is not automatically liable for the negligence of its subcontractors. See Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80,89 (2008). Instead, whether, and to what extent a general contractor is liable for the negligence of its subcontractors is a question for the fact-finder to determine. Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

Background

This is a construction defect action arising out of the construction of 11 townhomes known as One Hamlin Place ("One Hamlin"). RP Falcon Properties, LLC F/K/A JW Homes, LLC ("JW Homes") served as the general contractor for buildings 5 through 11 at One Hamlin Place (hereinafter collectively referred to, for convenience and purposes of this memorandum only, as "One Hamlin Phase II"). The Certificates of Occupancy ("CO") for One Hamlin Phase II were issued between April 23, 2013 and November 25, 2014 and identify JW Homes or JW Homes LLC as the contractor. See Exhibit A. The COs for Buildings 1 through 4 of One Hamlin were issued between August 5, 2009 and April 5, 2012 and identify John Wieland Homes & Neighborhood of the Carolinas as the contractor. See Exhibit B.

Plaintiff filed this action against the RP Companies[1], among others, alleging deficiencies in the construction of the townhomes at One Hamlin. The RP Companies

[1] Plaintiff alleges a theory of amalgamation against JW Homes and other entities, including the RP Companies, relating to a series of transactions that occurred between 2009 through 2012. Plaintiff claims that these entities and a number of others are amalgamated and that for purposes of any judgment that may be rendered in favor of the Plaintiff, these entities should be treated as a single

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answered the Plaintiff's complaint denying liability and filing cross-claims and a third-party complaint seeking indemnity from various subcontractors who performed the work at One Hamlin Phase II, alleging that these subcontractors must identify the RP Companies if and to the extent that the RP Companies are found liable to Plaintiff for damages relating to the subcontractors' work. All Exteriors was a subcontractor who performed work at buildings 5 and 7 through 11 at One Hamlin Phase II and has moved for summary judgment as to the RP Companies' claims. See purchase orders and invoices reflecting work performed by All Exteriors ("Exhibit C") and All Exteriors' Memorandum in Support at page 5. This motion should be denied as All Exteriors cannot establish that the undisputed facts show that All Exteriors is entitled to judgment against the RP Companies as a matter of law.

Argument

I. All Exteriors is not Entitled to Summary Judgment on the RP Companies' claim for Indemnity.

Genuine issues of material fact exists as to whether, and to what extent, the RP Companies are entitled to recover indemnity from All Exteriors for All Exteriors' work at One Hamlin Phase II. JW Homes did not self-perform the construction at One Hamlin Phase II. See Affidavit of JT McMickle ("Exhibit D"). Instead it paid subcontractors, such as All Exteriors, to perform the construction, including the work at One Hamlin Phase II claimed to be deficient in this suit. Id. and Exhibit C. While the RP Companies deny Plaintiff's claims, Plaintiff seeks damages from the RP Companies for All Exteriors' work at One Hamlin Phase II. All Exteriors installed the siding at Buildings 5, 7, 8, 9, 10 and

business enterprise. Therefore, while RP Falcon Properties, LLC F/K/A JW Homes, LLC was the general contractor for One Hamlin Phase II, for the purposes of this motion, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC (the "RP Companies") are each entitled to indemnity to the extent that Plaintiff proves they are amalgamated.

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11. See Exhibit C and All Exteriors' Memorandum in Support at page 5. Plaintiff contends there are deficiencies with the installation of the siding at those buildings.[2] Specifically, Plaintiff's experts claim as defective and call for the complete removal and replacement of the siding installed by All Exteriors:

instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2" ring shank hot dipped galvanized siding nail with a 0.22" nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

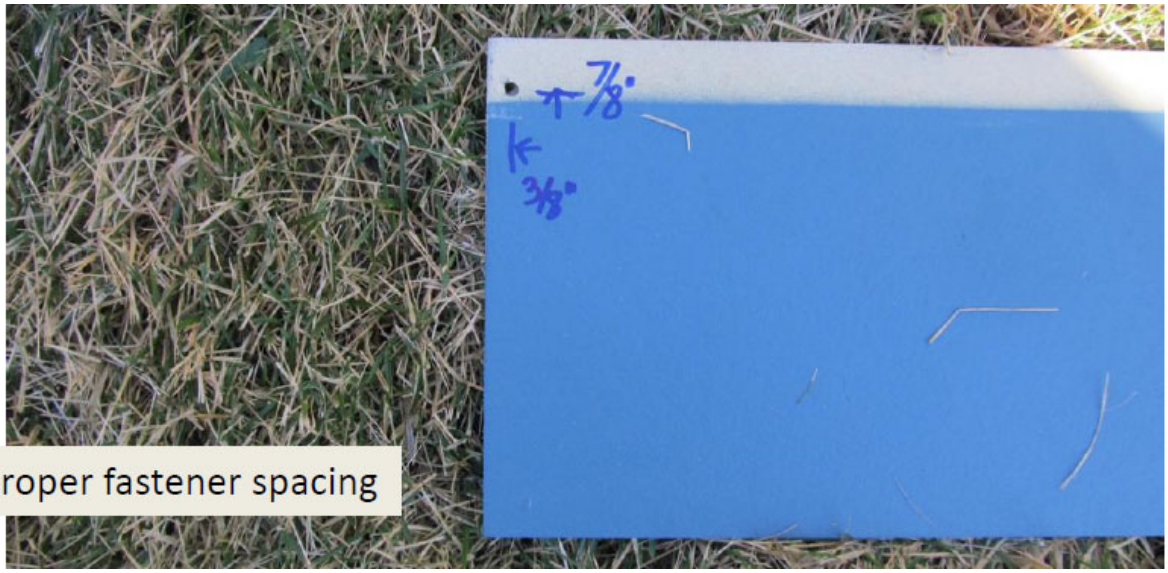
1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

Excerpts from the report of Myles Glick, AIA dated March 8, 2018 at page 3. (Exhibit E).

[2] To survive summary judgment, the RP Companies need only show that at least some of All Exteriors' work at One Hamlin Phase II is complained-of. For the sake of expediency and economy of briefing this memo does not purport to include a full listing of All Exteriors' complained-of work at One Hamlin Phase II.

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Q. Gotcha. What is the other issue?
A. And then the spacing between the -- is more than 16 inches, and these studs are 16 inches on this building. And then all the pictures surrounding it illustrate the same thing. It's a long board. And then 21 actually is the HardiePlank label, so it is HardiePlank. 22, it's nailed too close to the butt joint. And almost on an inch; it's 7/8ths. So it's fairly close, but it's just too close to the edge. It should be an inch. It's 3/8ths. There's just not a holding power of the board left.



Improper fastener spacing

Deposition of Myles Glick, AIA dated March 8, 2019, page 135 line 2 – line 13 (Exhibit F) and photo from Myles Glick's file referenced in the above testimony.

Q. But your opinion is that the siding needs to be replaced?
A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Deposition of Myles Glick, AIA dated March 11, 2019, page 268 line 5 – line 9. (Exhibit F).

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Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

Page 137

used?
A Yes. That's the second part of item two under Recommendations where I document that condition.

Deposition of R. Mease, dated March 14, 2019, page 136 line 19 – page 137 line 4. (Exhibit G)

All Exteriors argues that the RP Companies cannot maintain an equitable indemnity claim against the subcontractors based on the "negligence rule" that prevents joint tortfeasors from recovering from one another under a claim for equitable indemnity. As an initial point, the RP Companies have standing to assert equitable indemnity claims because "[a] general contractor's relationship with its subcontractor in the residential construction context is sufficient to support the general contractor's right of equitable indemnity against the subcontractor." Stoneledge at Lake Keowee v. Clear View, 413 S.C. 615, 776 SE 2d 426 (Ct. App. 2015).

> "To recover damages on its equitable indemnity claim, [the general contractor] must prove the following: (1) [the subcontractor] was at fault in causing [the homeowner's] water intrusion damages; (2) [the general contractor] has no fault for those damages; and (3) [the general contractor] incurred expenses that were necessary to protect its interest in defending against [the homeowner's] claim."

Id.

In Stoneledge, the Court of Appeals held that a general contractor does not necessarily share in the fault of defective work put in place by its subcontractors, and

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therefore, is able to recover from a subcontractor under a claim for equitable indemnity. Id.; See also Fields v. J. Haynes Waters Builders, Inc. 376 S.C. 545, 560, 658 S.E.2d 80,89 (2008)(A general contractor is not automatically responsible for the negligence of a subcontractor).

Accordingly, because the RP Companies can prove at trial that they do not necessarily share in the fault of the alleged defective siding installation performed by All Exteriors, genuine issues of material fact exist as to whether, and to what extent, the RP Companies can recover indemnity from All Exteriors. Id.; Exhibit D. This factual dispute will not be resolved until trial when Plaintiff's claims against the RP Companies, and the RP Companies' indemnity claims against its subcontractors, are heard and resolved.

II. All Exteriors' Motion regarding "disguised indemnity" under Stoneledge should be denied.

All Exteriors argues that the RP Companies' crossclaims for negligence, breach of warranty and breach of contract are not independent causes of action but merely "disguised indemnity claims." All Exteriors' Memorandum in Support at page 8 – 10. The RP Companies do not dispute that, under Stoneledge, its negligence, breach of warranty, and breach of contract causes of action form the substantive basis for its indemnity claim. However, these causes of action are not a veiled indemnity claim because the RP Companies will introduce evidence of the subcontractors' breaches that underpin the indemnity claim. As such, these claim, whether labeled "causes of action" or "basis for indemnity" are valid and should not be dismissed.

Conclusion

All Exteriors' motion for summary judgment should be denied, and the matter of the All Exteriors' potential liability to the RP Companies should be submitted to the jury

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after all the evidence is heard on Plaintiff's claims against the RP Companies and the RP Companies' claims against All Exteriors.

Respectfully submitted,

PARKER POE ADAMS & BERNSTEIN LLP
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And

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Attorneys for Defendants, RP Falcon Properties, LLC F/K/A JW Homes, LLC, RP Falcon Land, LLC, F/K/A JW Land Investment, LLC, RP Falcon Realty, LLC, F/K/A Wieland Realty, LLC, and Residential Partners, LLC

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Exhibit A

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TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/20/2014

PERMIT # RN-13-097683

PROJECT NAME: JW Homes

ADDRESS: 3061 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

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TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

07/26/2013

PERMIT # RN-12-092021

PROJECT NAME: John Wieland

ADDRESS: 3041 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

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Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

06/04/2013

PERMIT # RN-12-092020

PROJECT NAME: John Wieland Homes

ADDRESS: 3045 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

06/03/2013

PERMIT # RN-12-092015

PROJECT NAME: John Wieland Homes

ADDRESS: 3049 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/28/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-097682

PROJECT NAME: JW Homes

ADDRESS: 3053 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/20/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-097681

PROJECT NAME: JW Homes

ADDRESS: 3057 Monhegan Way

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes LLC
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29466

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/04/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-099693

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3065 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/16/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-099694

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3069 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

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TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/17/2014

PERMIT # RN-13-099696

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3073 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/19/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-099702

PROJECT NAME: JW Homes

OWNER NAME John Wieland Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3077 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/25/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-14-103063

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3081 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/25/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-14-103066

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3085 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Townhome
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/24/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-14-103071

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3089 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

11/24/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-14-103072

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 3093 Monhegan Way
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/02/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-101762

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2032 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2820
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

10/15/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-101734

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2036 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/29/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-101728

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2040 Amenity Park Dr.
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2817
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/09/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-101727

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502 Mt Pleasant

PROPERTY ADDRESS: 2044 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2012 IRC & 2009 IECC
PROPOSED USE: Townhome
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/19/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-096959

PROJECT NAME: JW Homes

ADDRESS: 2016 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2820

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/11/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-096939

PROJECT NAME: JW Homes

ADDRESS: 2020 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2782

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/22/2014

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-096936

PROJECT NAME: JW Homes

ADDRESS: 2024 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

OCCUPANCY LOAD: 0

CONSTRUCTION TYPE: VA

SQUARE FOOTAGE: 2817

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

12/19/2013

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

PERMIT # RN-13-096932

PROJECT NAME: JW Homes

OWNER NAME JW Homes
ADDRESS 3015 Dunes West Blvd Ste 502
Mt Pleasant

PROPERTY ADDRESS: 2028 Amenity Park Dr
Mt Pleasant, SC 29466

Contractor: JW Homes
3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Townhome 2006 IRC & 2009 IECC
PROPOSED USE: Single Family Dwelling
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family
OCCUPANCY LOAD: 0
CONSTRUCTION TYPE: VA
SQUARE FOOTAGE: 2782
SPRINKLED: 0

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances, Chapter 150 and the International Code Series with State Amendments. The building may only be occupied in accordance with the classification

T. Lee Cave, Building Official

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/17/2013

PERMIT # RN-12-091555

PROJECT NAME: John Wieland

ADDRESS: 2000 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Dwelling 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2749

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant
Come On Over

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

05/23/2013

PERMIT # RN-12-091606

PROJECT NAME: John Wieland

ADDRESS: 2004 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Townhome 2006 IRC & IECC

PROPOSED USE:
OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2676

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant
Came On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

04/23/2013

PERMIT # RN-12-091604

PROJECT NAME: John Wieland

ADDRESS: 2008 Amenity Park Dr

CITY, ST ZIP: Mt Pleasant, SC 29466

Contractor's Name JW Homes

3015 Dunes West Blvd Ste 502
Mt Pleasant SC 29464

CONSTRUCTION TYPE: New Single Family Home 2006 IRC & IECC

PROPOSED USE:

OCCUPANCY TYPE: R-3 and IRC Residential, one and two family

SQUARE FOOTAGE: 2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Exhibit B

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

07/26/2010

PERMIT #	RN-08-075072
PROJECT NAME:	John Wieland Homes
ADDRESS:	3017 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2003 IRC NEW FLOOD REGS
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2862

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/12/2011

PERMIT #	**RN-10-083723**
PROJECT NAME:	John Wieland
ADDRESS:	2041 Amenity Park Dr
CITY, ST ZIP:	Mt Pleasant, SC 29466
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/22/2011

PERMIT #	**RN-10-083743**
PROJECT NAME:	John Wieland Homes
ADDRESS:	2045 Amenity Park Dr
CITY, ST ZIP:	Mt Pleasant, SC 29466
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2676

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/05/2009

PERMIT #	**RN-08-075060**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3001 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	**2847**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/31/2010

PERMIT #	**RN-08-075062**
PROJECT NAME:	**John Wieland**
ADDRESS:	**3005 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**2652**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/14/2009

PERMIT #	RN-08-075063
PROJECT NAME:	John Wieland Homes
ADDRESS:	3009 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of the Carolinas 3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2003 IRC NEW FLOOD REGS
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2652

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/23/2010

PERMIT #	**RN-08-075069**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3013 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29464**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2003 IRC NEW FLOOD REGS**
PROPOSED USE: / **OCCUPANCY TYPE:**	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**3038**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/16/2011

PERMIT #	RN-10-081288
PROJECT NAME:	John Wieland
ADDRESS:	3022 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2750

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

09/08/2011

PERMIT #	**RN-10-083801**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3025 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC Flood AE 14 + 1
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2966

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/21/2011

PERMIT #	**RN-10-081226**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3026 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3119

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

04/05/2012

PERMIT #	**RN-10-083902**
PROJECT NAME:	John Wieland
ADDRESS:	3029 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC 29464
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC Flood Zone AE 14 + 1
PROPOSED USE: OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2705

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

02/02/2011

PERMIT #	**RN-10-081234**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3030 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29464**
Contractor's Name	**John Wieland Homes & Neighborhood of the Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**3081**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/07/2012

PERMIT #	**RN-10-083932**
PROJECT NAME:	**John Wieland Homes**
ADDRESS:	**3033 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC 29466**
Contractor's Name	**John Wieland Homes & Neighborhood of Carolinas**
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC - Flood AE 14 + 1**
PROPOSED USE:	
OCCUPANCY TYPE:	**R-3 and IRC Residential, one and two family**
SQUARE FOOTAGE:	**2675**

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant
Come On Over.

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

03/15/2011

PERMIT #	**RN-10-081201**
PROJECT NAME:	John Wieland Homes
ADDRESS:	3034 Monhegan Way
CITY, ST ZIP:	Mt Pleasant, SC
Contractor's Name	John Wieland Homes & Neighborhood of Carolinas
	3015 Dunes West Blvd Ste 502
	Mt Pleasant SC 29464
CONSTRUCTION TYPE:	New Townhome 2006 IRC & IECC
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	2732

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Mount Pleasant

TOWN OF MOUNT PLEASANT
BUILDING INSPECTIONS DIVISION

CERTIFICATE OF OCCUPANCY

08/23/2011

PERMIT #	**RN-10-083933**
PROJECT NAME:	**John Wieland**
ADDRESS:	**3037 Monhegan Way**
CITY, ST ZIP:	**Mt Pleasant, SC**
Contractor's Name	**John Wieland Homes & Neighborhood of Carolinas**
	3015 Dunes West Blvd Ste 502 Mt Pleasant SC 29464
CONSTRUCTION TYPE:	**New Townhome 2006 IRC & IECC - Flood AE 14 + 1**
PROPOSED USE:	
OCCUPANCY TYPE:	R-3 and IRC Residential, one and two family
SQUARE FOOTAGE:	3726

SPECIAL PROVISIONS:

This certificate is issued upon completion of inspections for compliance with the Town of Mount Pleasant Code of Ordinances. The building may only be occupied in accordance with the classification listed above.

BUILDING OFFICIAL

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Exhibit C

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005208

JOHN WIELAND HOMES
AND NEIGHBORHOODS

RECEIVED
FEB 03 2014
JW HOMES, LLC

MEASUREMENT PURCHASE ORDER

Number: 02967961 Date: 9/19/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0014
One Hamlin Place
3057 Monhegan Way
Mt. Pleasant SC 29464

Reverse Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~12.7000~~ 11.5	170.000	~~2,159.00~~	3335.00
sccrown	crown mold & frieze	lf	~~92.0000~~ 90	6.500	~~598.00~~	585.00
scfascia	fascia and soffit	lf	~~92.0000~~ 90	8.500	~~782.00~~	765.00
scpedimentbi	pediment build & install	each	~~8.0000~~ 2	70.000	~~0.00~~	140.00

Sub-Total ~~3,559.00~~
Sales Tax 0.00
Total Amt ~~3,539.00~~ 4825.00

Authorized Signature:
By:
Title:
Date:
PAYMENT APPROVED BY DOUG PILCHER ASSOC. SIG. BUILDER

Vendor\Sub-Contractor:
By:
Title:
Date: 1/20/14

Approved For Payment:
By: PAYMENT APPROVED BY
Title: SCOTT PARKER
Date: CONSTRUCTION MANAGER

[redacted]

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST CHARLESTON

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95135617

Vendor/Trade Partner: all Ext, llc		Neighborhood/Lot/Block: OHPT one hamlin place #14	
Vendor Number: (Must have vendor number for payment) +0795		Activity Number: (Only one activity number per VPO) 33700	Activity Description:
Vendor/Trade Partner Phone Number:	Date: 1/20/14	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
Work per invoice 187	x $	=	3290.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST-CHARLESTON

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

dawg

Subtotal: X

Sales Tax:

ELIMINATE THE VARIANCE!

VPO Total Amount: $ 3290.00

Builder Signature: PAYMENT APPROVED BY DOUG PILCHER ASSOC. SIG. BUILDER

by: _____

Vendor/Trade Partner Signature:

by: _____

Neighborhood Manager: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER

by: _____

Distribution: White – Accounting Yellow – Trade Partner

321090213

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

JOHN WIELAND HOMES
AND NEIGHBORHOODS

RECEIVED
FEB 03 2014
JW HOMES, LLC

MEASUREMENT PURCHASE ORDER

Number: 02967974 Date: 9/19/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0015
One Hamlin Place
3061 Monhegan Way
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension
0NOTEALIST	PO is for entire scope of work. VPOs will not be accepted	note	0.0000	0.000	0.00
1sidingtrim	Install all siding includes PT band	sqr	~~28.0000~~ 22	170.000	~~4,760.00~~ 6380.00
scbaywnddbl	double bay window	each	1.0000	500.000	500.00 ✓
sccrown	crown mold & frieze	lf	~~157.0000~~ 152	6.500	~~1,020.50~~ 988.00
scfascia	fascia and soffit	lf	~~157.0000~~ 152	8.500	~~1,334.50~~ 1292.00
scpedimentbl	pediment build & install	each	~~0.0000~~	70.000	~~0.00~~ 840.00

Sub-Total	~~7,514.50~~
Sales Tax	0.00
Total Amt	~~7,613.00~~ 10,000.00

PAYMENT APPROVED BY JAMES HUFFMAN VP COLLY-CHARLESTON

Authorized Signature:
By: PAYMENT APPROVED BY DOUG FLETCHER
Title: ASSOC. VIS. BUILDER
Date: 1/7

Vendor\Sub-Contractor:
By:
Title:
Date: 1/20/14

Approved For Payment:
By:
Title: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER
Date:

Close

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95135615

Vendor/Trade Partner:		Neighborhood/Lot/Block: OHP-T
all Ext., LLC		one hamlin place #15
Vendor Number: (Must have vendor number for payment)		Activity Number: (Only one activity number per VPO)
t0795		~~33~~, 33700
Vendor/Trade Partner Phone Number:	Date: 1/20/14	Original Budget:
		Paid to Date:

Activity Description:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 188	x $	=	3150.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

dsw g

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST CHARLESTON

Subtotal:

Sales Tax: X

ELIMINATE THE VARIANCE!

VPO Total Amount: $ 3150.00

Builder Signature: PAYMENT APPROVED BY DOUG PRICHER ASSOC SIG BUILDER
by: _____

Vendor/Trade Partner Signature:
by: _____

Neighborhood Manager:
by: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER

Distribution: White – Accounting Yellow – Trade Partner

321090213

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
1/20/2014	188

Bill To

JW HOMES, LLC
CHARLESTON DIVISION
P.O. BOX 87514
Atlanta, GA 30337

Ship To

one hamlin place
unit # 15
monhegan way

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
02967974			1/20/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
22	ns	siding	290.00	6,380.00
152	ch	cornice/hardi	8.50	1,292.00
152	fr	frieze	6.50	988.00
100	ba	bandboard	6.00	600.00
12	ped	pediments	70.00	840.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00
1	bd	bay/double	500.00	500.00

Total $13,150.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

RECEIVED
APR 28 2014
JW HOMES, LLC

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS

P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95134542

Vendor/Trade Partner:		Neighborhood/Lot/Block:	
all ext. llc		OHP-T Hermegan way one hamlin place unit 16	
Vendor Number: (Must have vendor number for payment) t0795		Activity Number: (Only one activity number per VPO) 33100	Activity Description:
Vendor/Trade Partner Phone Number:	Date: 4/29/14	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 306	x $	=	13,155.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

chip

Subtotal:	X
Sales Tax:	

ELIMINATE THE VARIANCE!

PAYMENT APPROVED BY
JAMES PARTIN
VP CONST. CHAIN
VPO Total Amount: $ 13,155.00

Builder Signature:

PAYMENT APPROVED BY
CHRIS COBB
SIGNATURE BUILDER

by: _____

Vendor/Trade Partner Signature:

by: _____

Neighborhood Manager:

PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER

by: _____

Distribution: White – Accounting Yellow – Trade Partner

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
4/28/2014	306

Bill To

JW HOMES, LLC
CHARLESTON DIVISION
P.O. BOX 87514
Atlanta, GA 30337

Ship To

one hamlin place
unit # 16

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134542			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
25	ns	siding	290.00	7,250.00
135	ch	cornice/hardi	8.50	1,147.50
135	fr	frieze	6.50	877.50
13	ped	pediments	70.00	910.00
70	ba	bandboard	6.00	420.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $13,155.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON COMMON PLEAS - CASE#2017CP1005245

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
4/28/2014	307

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 17

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134543			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
18	ns	siding	290.00	5,220.00
85	ch	cornice/hardi	8.50	722.50
85	fr	frieze	6.50	552.50
40	ba	bandboard	6.00	240.00
2	ped	pediments	70.00	140.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $9,925.00

Invoice

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

xteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
4/28/2014	308

Bill To

JW HOMES, LLC
CHARLESTON DIVISION
P.O. BOX 87514
Atlanta, GA 30337

Ship To

one hamlin place
unit # 18

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134544			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
17	ns	siding	290.00	4,930.00
70	ch	cornice/hardi	8.50	595.00
70	fr	frieze	6.50	455.00
20	ba	bandboard	6.00	120.00
7	ped	pediments	70.00	490.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,140.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95134593

Vendor/Trade Partner:		Neighborhood/Lot/Block:	
all Ext, LLC		OHP unit 19 3074 Monegan Way	
Vendor Number: (Must have vendor number for payment) t0795		Activity Number: (Only one activity number per VPO) 33450	Activity Description:
Vendor/Trade Partner Phone Number:	Date:	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 371	x $	=	14,517.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

doug

ELIMINATE THE VARIANCE!

Subtotal:

Sales Tax: X

VPO Total Amount: $ 14,517.00

Builder Signature:
PAYMENT APPROVED BY
DOUG PILCHER
SIGNATURE BUILDER
by: _____

Vendor/Trade Partner Signature:
by: _____

Neighborhood Manager:
PAYMENT APPROVED BY
SCOTT PARKER
CONSTRUCTION MANAGER
by: _____

Distribution: White – Accounting Yellow – Trade Partner

321090213

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2022CP1002245

Invoice

...riors Construction LLC
...6 meeting st
...SC 29405

Date	Invoice#
7/22/2014	371

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 19

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134593			7/22/2014			

Quantity	Item Code	Description	Price Each	Amount
	fp	Front Porch	0.00	0.00
6	np	set post	35.00	210.00
40	sh	standard handrails	18.00	720.00
0.36	c/s	ceiling soffit	275.00	99.00
16	wr	wrap porch beam	28.00	448.00
16	hb	porch hardi trim bandboard	7.00	112.00
28	l	landing	6.50	182.00
16	vl	large vents	260.00	4,160.00
1	a66	a/c stand	325.00	325.00
2	nc	set columns	75.00	150.00
10	s35	stairs 3 ' - 5'	50.00	500.00
	BP	Back Porch	0.00	0.00
42	sh	standard handrails	18.00	756.00
5.04	c/s	ceiling soffit	275.00	1,386.00
90	bac	back porch beam	16.00	1,440.00
10	66	6 x 6 laminated box column	110.00	1,100.00
21	hb	porch hardi trim bandboard	7.00	147.00
	GP	Garage Porch	0.00	0.00
1	np	set post	35.00	35.00
4	sh	standard handrails	18.00	72.00
1	a66	a/c stand	325.00	325.00
11	s35	stairs 3 ' - 5'	50.00	550.00
1	gdtio	garage door trim	180.00	180.00
24	wsb	wrap steel beam W/hardi stucco panels	25.00	600.00
1	fgdo	frame garage door opening	270.00	270.00
1	14gl	add 1 x 4 tky @ garage level	750.00	750.00

Total $14,517.00

RECEIVED
APR 29 2014
JW HOMES, LLC

ELECTRONICALLY FILED - 2022-May-02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

John Wieland

JOHN WIELAND HOMES
AND NEIGHBORHOODS
P.O. BOX 87514 • ATLANTA, GA 30337

Variance Purchase Order

95134545

Vendor/Trade Partner: all ext., llc		Neighborhood/Lot/Block: OHP-T 19 one hamlin place unit 19	
Vendor Number: (Must have vendor number for payment) t0795		Activity Number: (Only one activity number per VPO) 33700	Activity Description:
Vendor/Trade Partner Phone Number:	Date: 4/29/14	Original Budget:	Paid to Date:

Variance Code:

Original PO#:

Description of Work/Materials (only one activity number per VPO)	Quantity	Price	Subtotal
	x $	=	
	x $	=	
work per invoice 309	x $	=	14,225.00
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	
	x $	=	

COMMENTS TO ESTIMATOR/VPO PREVENTION RECOMMENDATION:

Chip

ELIMINATE THE VARIANCE!

PAYMENT APPROVED BY JAMES HUFFMAN VP CONST CHARLESTON

Subtotal: X

Sales Tax: X

VPO Total Amount: $ 14,225.00

Builder Signature: PAYMENT APPROVED BY CHIP COOPER SIGNATURE ON FILE 4/29/14 by: _____

Vendor/Trade Partner Signature: by: _____

Neighborhood Manager: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER by: _____

Distribution: White – Accounting Yellow – Trade Partner

3/10/07/13

[redacted] Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
4/28/2014	309

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 19

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134545			4/28/2014		chip	

Quantity	Item Code	Description	Price Each	Amount
26	ns	siding	290.00	7,540.00
155	ch	cornice/hardi	8.50	1,317.50
155	fr	frieze	6.50	1,007.50
90	ba	bandboard	6.00	540.00
11	ped	pediments	70.00	770.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $14,225.00

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	388

Bill To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337

Ship To
one hamlin place unit # 20

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136100			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
21.86	ns	siding front (6.60 right (13.46 left (0 back (1.8	290.00	6,339.40
133	ncm	metal fascia front (44 right (65 left (0 back (24	8.50	1,130.50
133	ncr	frieze front (44 right (65 left (0 back (24	4.00	532.00
67	ba	bandboard front (0 right (52 left (0 back (15	7.00	469.00
15	ped	pediments front (7 right (8	70.00	1,050.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $12,070.90

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	389

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 21

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136101			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
11.2	ns	siding front (4.60 back (6,6	290.00	3,248.00
84	ncm	metal fascia front (60 back (24	8.50	714.00
84	ncr	frieze front (60 back (24	4.00	336.00
39	ba	bandboard front (24 back (15	7.00	273.00
3	ped	pediments front (3	70.00	210.00
1	bd	bay/double	800.00	800.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $8,131.00

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ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON COMMON PLEAS - CASE#2017CP1005245

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
8/11/2014	390

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 22

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95136102			8/11/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
13.3	ns	siding front (6.70 back (6.6	290.00	3,857.00
68	ncm	metal fascia front (44 back (24	8.50	578.00
68	ncr	frieze front (44 back (24	4.00	272.00
15	ba	bandboard back (15	7.00	105.00
7	ped	pediments front (7	70.00	490.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $7,852.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964498 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0036
One Hamlin Place
2016
Mt. Pleasant SC 29466

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~22.0000~~ 19.5	170.000	~~3,740.00~~	3315.00
scbaywnddbl	double bay window	each	~~1.0000~~ 2	500.000	~~500.00~~	1000.00
sccrown	crown mold & frieze	lf	~~583.0000~~ 150	6.500	~~3,789.50~~	450.00
scfascia	fascia and soffit	lf	~~129.0000~~ 150	8.500	~~1,096.50~~	1050.00

Sub-Total ~~9,126.00~~
Sales Tax 0.00
Total Amt ~~9,126.00~~ 5815.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By:_____
Title:_____
Date: 10/23

PAYMENT APPROVED BY
ADAM JOHNSON
CONSTRUCTION LDS

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	110

Bill To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337

Ship To
one hamlin place unit 36

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
19.5	s	siding	170.00	3,315.00
150	cm	cornice/metal	7.00	1,050.00
150	cr	crown & frieze	3.00	450.00
87	ba	bandboard	6.00	522.00
11	ped	pediments	70.00	770.00
2	bd	bay/double	500.00	1,000.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,657.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

PURCHASE ORDER

Number: 02964501 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0037
One Hamlin Place
2020
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

Est Date Required:

F.O.B.:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~16.0000~~ 12.5	170.000	~~2,720.00~~	2125.00
sccrown	crown mold & frieze	lf	~~60.0000~~ 69	6.500	~~390.00~~	207.00
scfascia	fascia and soffit	lf	~~26.0000~~ 69	8.500	~~221.00~~	483.00

Sub-Total ~~3,331.00~~
Sales Tax 0.00
Total Amt ~~3,331.00~~ 2815.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By:_____
Title: PAYMENT APPROVED BY ADAM JOHNSON CONSTRUCTION-EMS
Date: 10/3

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	112

Bill To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337

Ship To
one hamlin place unit 37

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
12.5	s	siding	170.00	2,125.00
69	cm	cornice/metal	7.00	483.00
69	cr	crown & frieze	3.00	207.00
15	ba	bandboard	6.00	90.00
7	ped	pediments	70.00	490.00
1	bd	bay/double	500.00	500.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $6,445.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964504 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0038
One Hamlin Place
2024
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

F.O.B.:

Est Date Required:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~22.0000~~ 10.5	170.000	~~3,740.00~~	1785.00
scbaywnddbl	double bay window	each	~~1.0000~~ 2	500.000	~~500.00~~	1000.00
sccrown	crown mold & frieze	lf	~~66.0000~~ 81	6.500	~~429.00~~	243.00
scfascia	fascia and soffit	lf	~~133.0000~~ 81	8.500	~~1,130.50~~	567.00

Sub-Total ~~5,799.50~~
Sales Tax 0.00
Total Amt ~~5,799.50~~ 3595.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By: M
Title: PAYMENT APPROVED BY ADAM JOHNSON CONS. RELATIONS MGR
Date: 10/29

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	113

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 38

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
10.5	s	siding	170.00	1,785.00
81	cm	cornice/metal	7.00	567.00
81	cr	crown & frieze	3.00	243.00
2	bd	bay/double	500.00	1,000.00
36	ba	bandboard	6.00	216.00
3	ped	pediments	70.00	210.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00

Total $6,571.00

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JOHN WIELAND HOMES
AND NEIGHBORHOODS

MEASUREMENT PURCHASE ORDER

Number: 02964507 Date: 8/30/2013 For: (33700) Siding/Cornice Labor Print JRJC Form

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON SC 29405

Ship To: ohp-t/000/0039
One Hamlin Place
2028 Amenity Park Drive
Mt. Pleasant SC 29464

Standard Willingha1

Will Call To Verify Ship Date.

Est Date Required:

F.O.B.:

Payment Terms: Weekly Trades

Superintendent: FORREST CHIP COOPER JR

Group: 720

Resource/Use	Description	Unit	Quantity	Price	Extension	
1sidingtrim	Install all siding includes PT band	sqr	~~22.0000~~ 21.5	170.000	~~3,740.00~~	3655.00
sccrown	crown mold & frieze	lf	~~583.0000~~ 136	6.500	~~3,789.50~~	408.00
scfascia	fascia and soffit	lf	~~129.0000~~ 136	8.500	~~1,096.50~~	952.00

Sub-Total ~~8,626.00~~
Sales Tax 0.00
Total Amt ~~8,626.00~~ 5015.00

Authorized Signature:
By:_____
Title:_____
Date:_____

Vendor\Sub-Contractor:
By: J. Medina
Title:_____
Date:_____

Approved For Payment:
By: M
Title: PAYMENT APPROVED BY ... VP CONSTRUCTION-CHS
Date: 10/2

http://homelink.jwhomes.com/OnLinePOs/ViewPO.asp?IPONum...

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
10/21/2013	111

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit 39

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
chip			10/21/2013			

Quantity	Item Code	Description	Price Each	Amount
21.5	s	siding	170.00	3,655.00
136	cm	cornice/metal	7.00	952.00
136	cr	crown & frieze	3.00	408.00
67	ba	bandboard	6.00	402.00
14	ped	pediments	70.00	980.00
1	bd	bay/double	500.00	500.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Total $9,447.00

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Charleston - Construction

M E A S U R E M E N T P U R C H A S E O R D E R

Number: 03088754 Date: 01/30/2015

For: (33700) Siding/Cornice Labor

Plan Details
Willingha1 Willingham (chs)
STANDARD Revised: __/__/____

Lot/Block /

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON, SC 29405

Ship To: ohp-t/000/0042
One Hamlin Place
2040 Amenity Park Drive
Mt. Pleasant, SC 29464

Group: 720 CO: 000 Contract: CHS
Will Call To Verify Ship Date F.O.B.: Ship Via:
Date Required: 03/05/2014 (Estimated) Payment Terms: Weekly Trades
Superintendent: DOUGLAS PILCHER Phone:

Resource/Use	Description	Unit	Quantity	Price	Extension
1detailwall	Detailed Wall	each	1.0000	1,350.000	1,350.00
1parapet	Parapet Wall	ea	1.0000	1,200.000	1,200.00
1sidingtrim	Install all siding includes PT band	sqr	17.0000	290.000	4,930.00
band board	band board	lf	37.0000	7.000	259.00
scbaydbldet	Double Bay Window Detailed	ea	1.0000	900.000	900.00
crown	crown mold & frieze	lf	94.0000	4.000	376.00
ascia	fascia and soffit	lf	94.0000	8.500	799.00
scpedimentbi	pediment build & install	each	3.0000	70.000	210.00

Sub-Total	10,024.00
Sales Tax	0.00
Total Amt	10,024.00

Authorized Signature:
By: _____
Title: PAYMENT APPROVED BY DOUG PILCHER SIGNATURE BUILDER
Date: _____

Vendor/Sub-Contractor:
By: _____
Title: _____
Date: _____

Approved For Payment:
By: _____
Title: PAYMENT APPROVED BY SCOTT PARKER CONSTRUCTION MANAGER
Date: _____

RECORD ON APPEAL

Invoice

All Exteriors Construction LLC

4116 meeting st
SC 29405

Date	Invoice #
7/22/2014	362

03088754

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 42

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134570			7/22/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
17	ns	siding front (740 back (960	290.00	4,930.00
94	cm	cornice/metal front n(70 back (24	8.50	799.00
94	cr	crown & frieze front (70 back (24	4.00	376.00
37	ba	bandboard front (22 back (15	7.00	259.00
3	ped	pediments front (3	70.00	210.00
1	pw	parapet wall	1,200.00	1,200.00
1	dw	detailed wall	1,350.00	1,350.00
1	bd	baywindow double detailed	900.00	900.00

Total $10,024.00

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Charleston - Construction

MEASUREMENT PURCHASE ORDER

Number: 03088743 Date: 01/30/2015

For: (33700) Siding/Cornice Labor

Plan Details
Willingha1 Willingham (chs)
STANDARD Revised: __/__/__

Lot/Block
/

To: t0795-ALL EXTERIORS CONSTR
4116 MEETING STREET
N CHARLESTON, SC 29405

Ship To: ohp-t/000/0043
One Hamlin Place
2044 Amenity Park Drive
Mt. Pleasant, SC 29464

Group: 720 CO: 000 Contract: CHS
Will Call To Verify Ship Date F.O.B.: Ship Via:
Date Required: 03/05/2014 (Estimated) Payment Terms: Weekly Trades
Superintendent: DOUGLAS PILCHER Phone:

Resource/Use	Description	Unit	Quantity	Price	Extension
1detailwall	Detailed Wall	each	1.0000	1,350.000	1,350.00
1parapet	Parapet Wall	ea	1.0000	1,200.000	1,200.00
1sidingtrim	Install all siding includes PT band	sqr	24.0000	290.000	6,960.00
band board	band board	lf	67.0000	7.000	469.00
sccrown	crown mold & frieze	lf	134.0000	4.000	536.00
scfascia	fascia and soffit	lf	134.0000	8.500	1,139.00
sc-edimentbi	pediment build & install	each	15.0000	70.000	1,050.00

Sub-Total	12,704.00
Sales Tax	0.00
Total Amt	12,704.00

Authorized Signature:
By: _____
Title: PAYMENT APPROVED BY DOUG PILCHER SIGNATURE REQ'D
Date: _____

Vendor/Sub-Contractor:
By: _____
Title: _____
Date: _____

Approved For Payment:
By: [illegible] SCOTT PARKER
Title: CONSTRUCTION MANAGER
Date: _____

RECORD ON APPEAL 1367

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All Exteriors Construction LLC

4116 meeting st
SC 29405

Invoice

Date	Invoice #
7/22/2014	363

03088743

Bill To	Ship To
JW HOMES, LLC CHARLESTON DIVISION P.O. BOX 87514 Atlanta, GA 30337	one hamlin place unit # 43

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
95134571			7/22/2014		doug	

Quantity	Item Code	Description	Price Each	Amount
24	ns	siding front (660 right (1380 back (360	290.00	6,960.00
134	cm	cornice/metal front (44 right (66 back (24	8.50	1,139.00
134	cr	crown & frieze front (44 right (66 back (24	4.00	536.00
67	ba	bandboard right (52 back (15	7.00	469.00
15	ped	pediments front (7 right (8	70.00	1,050.00
1	dw	detailed wall	1,350.00	1,350.00
1	pw	parapet wall	1,200.00	1,200.00

Nothing paid to 33700- siding

Total $12,704.00

RP COMPANIES 007671

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Exhibit D

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON One Hamlin Place Townhome Association, Inc., Plaintiff vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 AFFIDAVIT OF JT MCMICKLE

PERSONALLY APPEARED before me, JT McMickle who, being first duly sworn, deposes and says:

1. I am over 18 years of age and otherwise competent to provide this affidavit and the testimony herein.

2. I served as Chief Financial Officer for RP Falcon Properties, LLC f/k/a JW Homes, LLC ("JW Homes") during the time of construction of Buildings 5 through 11 of

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

the One Hamlin Townhome project (hereinafter collectively referred to, for convenience and purposes of this affidavit only, as "One Hamlin Phase II").

3. That JW Homes did not self-perform work at One Hamlin Phase II.

4. That subcontractors were paid to perform the work at One Hamlin Phase II.

5. I have personal knowledge of the business records of JW Homes.

6. That the purchase orders and invoices produced by JW Homes are part of the business records of JW Homes.

7. That the purchase orders and invoices produced by JW Homes in this case are kept in the regular course of JW Homes' business.

8. That it was the regular practice of JW Homes to create the purchase orders invoices at or about the time the work described on the purchase orders or invoices was performed.

9. That based on my review of the business records of JW Homes for One Hamlin Phase II, All Exteriors Construction, LLC ("All Exteriors") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5, 7, 8, 9, 10, and 11, including the siding installation at buildings 7-11 of One Hamlin Phase II.

10. That based on my review of the business records of JW Homes for One Hamlin Phase II, Jorge Medina, And Jorge Medina A/K/A JMC Construction, LLC A/K/A JMC Construction, Inc.'s ("JMC") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5 and 6 of One Hamlin Phase II, including the installation of the siding at Buildings 5 and 6.

Further, AFFIANT SAYETH NOT.

(Signature page to follow)

JT McMickle

The forgoing statement was sworn to and
Acknowledged before me this 14
Day of April 2022

Notary Public for Utah
My Commission expires: 5/10/23

NOTARY PUBLIC
JOSIE A HAGEN
COMM. # 706267
COMMISSION EXPIRES
MAY 10, 2023
STATE OF UTAH

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

RECORD ON APPEAL 1371

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Exhibit E

ELECTRONICALLY FILED - 2022 May 02 3:27 PM - CHARLESTON - COMMON PLEAS - CASE#2017CP1005245

Myles Glick Architect LLC
66 Rebellion Road, Charleston, SC
29407
mylesglickarchitectllc@live.com

March 8, 2018

Myles Glick, AIA LEED AP
Myles Glick Architect LLC
66 Rebellion Road
Charleston, South Carolina 29407

Mr. John C. Hayes IV
180 Meeting Street
Suite 305
Charleston, South Carolina 29401

Mr. I. Keith McCarty
McCarty Law Firm
1212 Wappoo Road
P.O. Box 30055
Charleston, South Carolina 29417

Re: Preliminary Report (Non Destructive and Destructive Review)
One Hamlin Place
Hamlin Plantation
Mt. Pleasant, South Carolina

In accordance with the request of the homeowners, the following report is presented to the One Hamlin Place Condominium Association for their review and use.

This report contains the results of the non-destructive reviews and the destructive testing. The non-destructive reviews took place on May 13, 2015, July10, 2015 and August 14, 2017. Additional destructive and additional non-destructive reviews took place on November 2,3, 2017. The exterior of the complex and the interior of one unit (#3013 Mohegan Way) was investigated on August 14, 2017. Nineteen (19) destructive test holes/areas of investigation were made on November 2, 2017 and twenty three (23) test holes on November 3, 2017 with additional interior reviews taking place (units #3077,#2044, #3001, #2020 and #2044).

This report is not a complete analysis of **a**ll building systems (mechanical, electrical, plumbing and structural) but rather a specific review of the building skin (walls) and roof/flashing systems. The review is focused on construction deficiencies that have resulted in water intrusion and building component failure. Additional construction

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4. At the paneled walls, head flashing immediately above windows is not present and all sealant joints at window/trim intersections do not have the proper gap for a backer rod and sealant joint.
5. The windows are by YKK ap and are double flange single hung solid vinyl windows that do not allow for a proper engineered caulk joint at all trim intersections.
6. Most window and door head flashing is caulked shut.
7. Kick out flashing is missing at appropriate areas

B. Cementitious Siding

The Building Code allows alternative products to be used if they pass a compliance test by a third party testing agency. The cementitious product used at One Hamlin Place is primarily a product by Hardi Plank. In accordance with NER #409, Hardi Plank has been approved for use if it is installed in accordance with the manufacture's installation instructions. If it is not installed in accordance with the manufacture's installation instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-identified at this time. Installation requirements and therefore, construction deficiencies would be the same as Hardie Plank.

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2” ring shank hot dipped galvanized siding nail with a 0.22” nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

References to Hardie Plank are to all cementitious materials in this report. The 2008/09/12 Hardie Plank installation Instructions were published and available. Therefore they would apply to the installation of the Hardie Plank siding at One Hamlin Place. Common to all installation instructions are the following.

1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

C. Windows

After investigating all eleven buildings, it was determined that all windows are solid vinyl single hung with a DP of 50. They are not impact resistant windows. The

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Exhibit F

STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME I

DEPOSITION OF: MYLES GLICK, AIA, LEED, AP

DATE TAKEN: Friday, March 8, 2019

TIME: 10:07 a.m.

PLACE: Young Clement Rivers
25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

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Electronically signed by Eve Wilbanks (101-177-349-6970) 66d64b34-238a-476d-a132-5a6b8d330f22

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Q. Let me direct your attention to 32. We're now back to building 1. I think we talked earlier in the deposition that here the water intrusion that you can document with the -- is that -- in 32 and 33, am I seeing sealant splitting, or is that something else I'm looking at?

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STATE OF SOUTH CAROLINA) THE COURT OF COMMON PLEAS
)
COUNTY OF CHARLESTON) CASE NO. 2017-CP-10-5245

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,

Plaintiff,

vs.

JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., AS SUCCESSOR BY STATUTORY MERGER TO JOHN WIELAND HOMES AND NEIGHBORHOODS OF SOUTH CAROLINA, INC., et al.,

Defendants.

* * * * * * * * * * * * * * * * *

VOLUME II

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DATE TAKEN: Monday, March 11, 2019

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25 Calhoun Street, 4th Floor
Charleston, South Carolina

REPORTED BY: EVE WILBANKS
Registered Professional Reporter, Certified LiveNote Reporter and Notary Public

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Q. But your opinion is that the siding needs to be replaced?

A. Absolutely. For the exposure and the type of fastener and the lack of fastener penetration at the studs after.

Q. You were asked some questions and shown photographs of the -- I think it's been described as the white panels that were installed typically on the rear of the buildings with the flat roofs, correct?

A. Correct. They were also on bay windows on the sides, and they're also on the siding when some of the back areas turned the corner, as we saw on that very first unit. When you go in the project, with the brick facade, there's at least 12 feet of those panels that wrap the corner.

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Exhibit G

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STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON

ONE HAMLIN PLACE TOWNHOME ASSOCIATION, INC.,	)	
Plaintiff,	)	
-versus-	)	Case No.: 2017-CP-10-5245
JOHN WIELAND HOMES AND NEIGHBORHOODS OF THE CAROLINAS, INC., et al.,	)	
Defendants.	)	

THE DEPOSITION OF RUSSELL T. MEASE was taken as a witness on behalf of the Defendants, pursuant to South Carolina Rules of Civil Procedure, at 10:00 a.m. on Thursday, the 14th day of March 2019, at the offices of Robertson Hollingsworth Manos & Rahn, 550 King Street, Suite 300, Charleston, South Carolina, before Janice O. Darby, Registered Professional Reporter and Notary Public in and for the State of South Carolina.

Janice Ohlendorf Darby, RPR
(843) 814-7666 jodarby@comcast.net

Electronically signed by Janice Darby (501-053-347-5716) aed2cdd7-af45-43ef-a6ce-e26be304261c

Q I understand. Just because other contractors may have done it in the community doesn't make it so, and you wouldn't rely on what other contractors may have done to support a opinion to a reasonable degree of engineering certainty as to what the contractors did in this case. Correct?

A True. But I'm relying on Mr. Glick and his evaluation of the property and him relaying to me that they were the typical nail that was used.

Q I understand. So again, the basis of your opinion that the fasteners used at all 11 buildings on this project on the HardiePlank were improper is based on six nails we see in DT 33 and photo 72 of Exhibit 36 and that Mr. Glick, the other primary expert in this case that did the investigation, told you that that's what he saw as being out on the project?

A Correct.

Q You did not bracket in 17A item No. 2 which says, "Remove all siding and repair all damaged sheathing," and goes on to talk about applying the fluid-applied. And we asked Mr. Glick about that. Do you intend to opine that all the HardiePlank siding out at the site needs to be removed and replaced because improper fasteners were

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used?

A Yes. That's the second part of item two under Recommendations where I document that condition.

Q So you note, "The use of improper fasteners will negatively affect the ability of the siding to resist wind loading."

A Yes. Mr. Glick gave other reasons also for needing to remove the siding, but mine is a supporting element to that recommendation.

Q And we talked about the fasteners used, and I know this is probably an over-generalization. But when we looked at that chart, assuming Mr. Glick was accurate and we do have the siding nails out there instead of the roofing nails, those generally are only sufficient up to about 80 miles an hour is what that chart told us?

A I think it was 70 at a 40-foot height, but yes.

Q I don't know that it matters, but just to make sure that I'm accurate as to what I was looking at, if we go back to page 27 of NER 405.

A Yes. A 40-foot height is 70 miles an hour.

Q Are there any other components or

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STATE OF SOUTH CAROLINA COUNTY OF CHARLESTON One Hamlin Place Townhome Association, Inc., Plaintiff vs. John Wieland Homes and Neighborhoods of the Carolinas, Inc. as successor by statutory merger to John Wieland Homes and Neighborhoods of South Carolina, Inc.; et al. Defendants. RP Falcon Properties, LLC (f/k/a JW Homes, LLC); RP Falcon Land, LLC (f.k.a JW Land Investment, LLC); RP Falcon Realty, LLC (f.k.a Wieland Realty, LLC); and Residential Partners, LLC Third-Party Plaintiffs, vs. COY-CY Construction; Evans Enterprises; IML Construction, LLC; and Marcus Built, LLC Third-Party Defendants.	IN THE COURT OF COMMON PLEAS NINTH JUDICIAL CIRCUIT CASE NO: 2017-CP-10-05246 AFFIDAVIT OF JT MCMICKLE

PERSONALLY APPEARED before me, JT McMickle who, being first duly sworn, deposes and says:

1. I am over 18 years of age and otherwise competent to provide this affidavit and the testimony herein.

2. I served as Chief Financial Officer for RP Falcon Properties, LLC f/k/a JW Homes, LLC ("JW Homes") during the time of construction of Buildings 5 through 11 of

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the One Hamlin Townhome project (hereinafter collectively referred to, for convenience and purposes of this affidavit only, as "One Hamlin Phase II").

3. That JW Homes did not self-perform work at One Hamlin Phase II.

4. That subcontractors were paid to perform the work at One Hamlin Phase II.

5. I have personal knowledge of the business records of JW Homes.

6. That the purchase orders and invoices produced by JW Homes are part of the business records of JW Homes.

7. That the purchase orders and invoices produced by JW Homes in this case are kept in the regular course of JW Homes' business.

8. That it was the regular practice of JW Homes to create the purchase orders invoices at or about the time the work described on the purchase orders or invoices was performed.

9. That based on my review of the business records of JW Homes for One Hamlin Phase II, All Exteriors Construction, LLC ("All Exteriors") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5, 7, 8, 9, 10, and 11, including the siding installation at buildings 7-11 of One Hamlin Phase II.

10. That based on my review of the business records of JW Homes for One Hamlin Phase II, Jorge Medina, And Jorge Medina A/K/A JMC Construction, LLC A/K/A JMC Construction, Inc.'s ("JMC") was a subcontractor at One Hamlin Phase II and was paid for and performed work at Buildings 5 and 6 of One Hamlin Phase II, including the installation of the siding at Buildings 5 and 6.

Further, AFFIANT SAYETH NOT.

(Signature page to follow)

JT McMickle

The forgoing statement was sworn to and
Acknowledged before me this 14
Day of April 2022

Notary Public for Utah
My Commission expires: 5/10/23

NOTARY PUBLIC
JOSIE A HAGEN
COMM. # 706267
COMMISSION EXPIRES
MAY 10, 2023
STATE OF UTAH

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RECORD ON APPEAL 1386

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Myles Glick Architect LLC
66 Rebellion Road, Charleston, SC
29407
mylesglickarchitectllc@live.com

March 8, 2018

Myles Glick, AIA LEED AP
Myles Glick Architect LLC
66 Rebellion Road
Charleston, South Carolina 29407

Mr. John C. Hayes IV
180 Meeting Street
Suite 305
Charleston, South Carolina 29401

Mr. I. Keith McCarty
McCarty Law Firm
1212 Wappoo Road
P.O. Box 30055
Charleston, South Carolina 29417

Re: Preliminary Report (Non Destructive and Destructive Review)
One Hamlin Place
Hamlin Plantation
Mt. Pleasant, South Carolina

In accordance with the request of the homeowners, the following report is presented to the One Hamlin Place Condominium Association for their review and use.

This report contains the results of the non-destructive reviews and the destructive testing. The non-destructive reviews took place on May 13, 2015, July10, 2015 and August 14, 2017. Additional destructive and additional non-destructive reviews took place on November 2,3, 2017. The exterior of the complex and the interior of one unit (#3013 Mohegan Way) was investigated on August 14, 2017. Nineteen (19) destructive test holes/areas of investigation were made on November 2, 2017 and twenty three (23) test holes on November 3, 2017 with additional interior reviews taking place (units #3077,#2044, #3001, #2020 and #2044).

This report is not a complete analysis of **a**ll building systems (mechanical, electrical, plumbing and structural) but rather a specific review of the building skin (walls) and roof/flashing systems. The review is focused on construction deficiencies that have resulted in water intrusion and building component failure. Additional construction

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4. At the paneled walls, head flashing immediately above windows is not present and all sealant joints at window/trim intersections do not have the proper gap for a backer rod and sealant joint.
5. The windows are by YKK ap and are double flange single hung solid vinyl windows that do not allow for a proper engineered caulk joint at all trim intersections.
6. Most window and door head flashing is caulked shut.
7. Kick out flashing is missing at appropriate areas

B. Cementitious Siding

The Building Code allows alternative products to be used if they pass a compliance test by a third party testing agency. The cementitious product used at One Hamlin Place is primarily a product by Hardi Plank. In accordance with NER #409, Hardi Plank has been approved for use if it is installed in accordance with the manufacture's installation instructions. If it is not installed in accordance with the manufacture's installation instructions, it is in violation of the building code and is subject to failure. The siding at One Hamlin Place is installed in violation of the manufacture's installation instructions and therefore, is in violation of the building code in effect at the time the building permit was issued. Another cementitious siding was used at One Hamlin Place but remains un-identified at this time. Installation requirements and therefore, construction deficiencies would be the same as Hardie Plank.

The Hardiplank siding has been installed using a blind nailing installation. The fasteners used for installation are 2” ring shank hot dipped galvanized siding nail with a 0.22” nominal diameter head. This is a violation of the IRC, Section R703.4 and the James Hardie installation requirements for the location of the home. The use of improper fasteners will negatively affect the ability of the siding to resist wind loading.

References to Hardie Plank are to all cementitious materials in this report. The 2008/09/12 Hardie Plank installation Instructions were published and available. Therefore they would apply to the installation of the Hardie Plank siding at One Hamlin Place. Common to all installation instructions are the following.

1. Lack of proper fastener spacing (should be 16" on center)
2. Lack of proper fasteners (too small)
3. Lack of fasteners in studs (all fasteners shall penetrate the studs 1 1/2 ")
4. Lack of 1/8" gap at trim intersections and siding butt joints for sealant
5. Lack of proper 1" gap at siding/roof intersections
6. Hardie Plank in contact with flashing and sealant
7. Lack of fasteners at butt joints
8. Lack of a stud at a butt joint

C. Windows

After investigating all eleven buildings, it was determined that all windows are solid vinyl single hung with a DP of 50. They are not impact resistant windows. The

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