

**RECEIVED**

**Mar 08 2023**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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Appeal from Horry County  
Court of Common Pleas

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

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Case No. 2018-CP-26-03173  
Appellate Case No. 2022-001529

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

Appellants,

v.

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

Respondents.

and

Myrtle Beach Resort Homeowners' Association, Inc.,

Nominal Defendant.

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**NOTICE OF APPEARANCE**

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*\*Counsel identified on following page*

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Nicholas J. Rivera (SC Bar No. 77186)

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*Attorneys for Nominal Defendant  
Myrtle Beach Resort Homeowners'  
Association, Inc.*

TO: THIS HONORABLE COURT AND COUNSEL OF RECORD

Please enter/note the appearance of attorney **Russell G. Hines** (SC Bar No. 72100), of Clement Rivers, LLP, as additional counsel of record in this matter (along with attorneys Edward D. Buckley, Jr., and Nicholas J. Rivera, both of Clement Rivers, LLP, and attorney Robert E. Lee, of Robert E. Lee, LLC, who are already counsel of record) for **Nominal Defendant Myrtle Beach Resort Homeowners' Association, Inc.** Mr. Hines's contact information is provided in the signature block below.

PLEASE NOTE: Because our client, Myrtle Beach Resort Homeowners' Association, Inc., is identified as a "Nominal Defendant," as opposed to a "Respondent," we do not believe that the South Carolina Appellate Court Rules call for our client to file/serve any responsive brief in this appeal; however, to the extent that a brief from our client is called for, we would ask that the Court advise us of the same and allow us a reasonable amount of time to prepare a brief.

**<SIGNED ON THE FOLLOWING PAGE>**

Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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Association, Inc.*

Charleston, South Carolina

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and

Myrtle Beach Resort Homeowners' Association, Inc.,

Nominal Defendant.

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**PROOF OF SERVICE**

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Association, Inc.*

I, Russell G. Hines, of Clement Rivers, LLP, attorneys for Nominal Defendant Myrtle Beach Resort Homeowners' Association, Inc., hereby certify that the foregoing **NOTICE OF APPEARANCE** was served on all other parties to this matter on March 8, 2023, by emailing (see attached email) a copy of the same to their counsel of record:

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Respectfully submitted,  
CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
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Charleston, South Carolina

March 8, 2023

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**Cc:** [Buckley, Ed](#); [Rivera, Nicholas \(Nick\)](#); [Bell, Pollyana \(Polly\)](#); [Justman, Aimee](#)  
**Subject:** Brown v. Richardson (2022-001529) -- Notice of Appearance  
**Date:** Wednesday, March 8, 2023 4:04:11 PM  
**Attachments:** [image001.png](#)  
[Brown v. Richardson \(2022-001529\) -- Notice of Appearance.pdf](#)

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Attached regarding the above-referenced matter please find a **Notice of Appearance**.

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