

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

William H. Seals, Jr., Circuit Court Judge

Appellate Case No.: 2022-001529

**RECEIVED**

**May 16 2023**

**SC Court of Appeals**

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

v.

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,

Myrtle Beach Resort Homeowners' Association, Inc.,.....Nominal Respondent

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**PROOF OF SERVICE**

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I certify that I have served the Reply Brief of Appellants on the Respondents, by depositing a copy of it in the United States Mail, Postage Prepaid, on May 16, 2023, addressed to the following attorneys of record:

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May 16, 2023

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*s/ Howell V. Bellamy, III*

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

RE: **PROOF OF SERVICE**  
Frederick E. Brown, et al. v. Jeffrey L. Richardson, et al.  
Appellate Case No.: 2022-001529

Dear Ms. Kitchings:

Enclosed please find the Appellants' Reply Brief for filing in the above-referenced matter. By copy of this letter to all counsel of record, we are also serving them with copies of the same.

Should you have any questions or require any additional information, please do not hesitate to contact our office.

With kindest regards, we are

**BELLAMY, RUTENBERG, COPELAND  
EPPS, GRAVELY & BOWERS, P.A.**

*s/ Howell V. Bellamy, III*

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Enclosures

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May 16, 2023

Page 2

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