

RECEIVED

Feb 16 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Carmen T. Mullen, Circuit Court Judge
Case No. 2018-CP-26-00307

Appellate Case No. 2023-001132

Wedgewood Condominium Association, Respondent

vs.

Centex Homes, a Nevada General Partnership; Balfour Beatty Construction, LLC as
successor by merger to Centex Construction Company, Inc. and Centex Construction, LLC;
Crescent Engineering, Inc., Defendants.

OF WHICH:

Centex Homes, a Nevada General Partnership; Balfour Beatty Construction, LLC as
successor by merger to Centex Construction Company, Inc. and Centex Construction, LLC,
are..... Appellants

and

Centex Homes, a Nevada General Partnership, Third Party Plaintiff

v.

Right Way Construction, Inc. a/k/a RWG, Inc. a/k/a Right Way Group, Inc. a/k/a RWGR, Inc.;
Frank Harris d/b/a Frank Harris Construction a/k/a F. Harris Construction a/k/a Harris Drywall;
Builders First Source – South East Group, LLC; Stock Building Supply, LLC f/k/a Stock
Building Supply, Inc. f/k/a Carolina Builders Corporation; Michael D. Brownlee d/b/a Carolina
Drywall & Interiors; Carolina Drywall & Interior, Inc. a/k/a Carolina Drywall & Interiors, Inc.
a/k/a Carolina Drywall Contractors, Inc.; Roof Doctor of the Carolinas, Inc.; John D. Frazier
d/b/a and/or a/k/a Roof Doctor and/or Roof Doctor of the Carolinas and/or Roof Doctor of the
Carolinas, Inc.; Steven Bosch d/b/a The Roofer Man; Tri-City Insulation and Building Products
of Myrtle Beach, Inc.; Martin Mata d/b/a Martin Masonry; Martin Masonry, Inc.; BR Brick &
Masonry, Inc.; BR Brick & Masonry, LP f/k/a BR Brick & Masonry, Inc.; Unicon Concrete, LLC;
Seno’s Cleaning Services; Rice Planter Carpets, Inc. n/k/a Creative Touch Interiors, Inc., Floors,
Inc. Successor by Merger to Rice Planter Carpets, Inc.; Carpets By Kendall, Inc.; Reliable Floor

Systems, Inc.; TNT Painting; Paint with Pride a/k/a Painting with Pride; William Evans d/b/a Top Notch Painters; Morningstar Consultants Inc.; MI Windows and Doors, LLC; Michael Dawson d/b/a Michael Dawson Construction, and Inc.; Vereen Concrete Co. Inc.; AK Construction Inc. a/k/a AK Framing and Siding Co.; and AK United, Inc. f/k/a AK Construction Inc., Third Party Defendants.

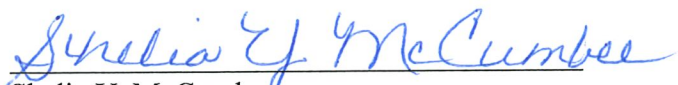
PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of **Initial Brief of Respondent and Respondent’s Designation of Matter to be Included in Record on Appeal** on the 16th day of February, 2024, by depositing a copy of same in the United States Mail, postage prepaid, to:

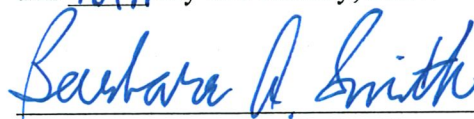
Thomas C. Hildebrand, Jr., Esquire
William G. DesChamps, IV, Esquire
Paul N. Nybo, Esquire
Parker Poe Adams & Bernstein, LLP
850 Morrison Drive, Suite 400
Charleston, SC 29403

Katon E. Dawson, Jr. Esquire
Parker Poe Adams & Bernstein, LLP
1221 Main Street, Suite 1100
Columbia, SC 29201

Jeffrey A. Turner, Esquire
Stephanie A. Douglas, Esquire
Bush Seyferth PLLC
100 W Big Beaver Road, Suite 400
Troy, MI 48084


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 16th day of February, 2024.


Notary Public for South Carolina
My Commission Expires: 1-24-34

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS
*OF COUNSEL

AREA CODE 843
238-5648
FAX: 238-5050

February 16, 2024

ctappfilings@sccourts.org

The Honorable Jenny Abbot Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Appellate Case No. 2023-001132
Wedgewood Condominium Association v. Centex Homes, et al.
C/A No. 2018-CP-26-00307
Our File No. 2018-0272C

Dear Ms. Kitchings:

Enclosed please find the following for filing in the above-captioned case: (1) Initial Brief of Respondent; (2) Respondent's Designation of Matter to be Included in the Record on Appeal; and (3) Proof of Service.

By copy of this letter, we hereby serve the above-stated documents on Appellants through counsel of record.

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures

cc w/enc.: Thomas C. Hildebrand, Jr., Esquire
William G. DesChamps, IV, Esquire
Paul N. Nybo, Esquire
Katon E. Dawson, Jr., Esquire
Jeffrey A. Turner, Esquire (Pro Hac Vice)
Stephanie A. Douglas, Esquire (Pro Hac Vice)
Stacy L. Stanley, Esquire