

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
FEB 20 2024
SC Court of Appeals

APPEAL FROM HORRY COUNTY COMMON PLEAS COURT
Honorable Carmen T. Mullen, Circuit Court Judge

Appellate Case No. 2023-001150
Trial Court Case No. 2018-CP-26-00307

Wedgewood Condominium Association, Appellant,

v.

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 the Respondents.

PROOF OF SERVICE & CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that on February 20, 2024, a copy of **Respondents' Final Brief** was served on all counsel of record via email containing the above referenced document to counsel's individual AIS email addresses:

Gene M. Connell, Jr. (S.C. Bar No. 1358)
L. Sidney Connor, IV (S.C. Bar No. 1363)
Kelahe, Connell & Connor, P.C.
The Courtyard, Suite 209
1500 U.S. Highway 17 North
Post Office Drawer 14547
Surfside Beach, SC 29587-4547
(843) 238-5648
gconnell@classactlaw.net
sconnor@classactlaw.net

Stacy L. Stanley (SC Bar No.: 13410)
Stanley Law Firm
3303 Highway 9 East
Little River, SC 29566-7825
(843) 390-9111
sstanley@stanleylawfirm.com

The undersigned also certifies that Respondent's Final Brief complies with Rule 211(b), SCACR.

Dated: February 20, 2024

Respectfully submitted,

/s/ Stephanie A. Douglas
Stephanie A. Douglas (admitted pro hac vice)
Jeffrey A. Turner (admitted pro hac vice)
Bush Seyferth PLLC
100 W. Big Beaver Road, Suite 400
Troy, MI, 48084
(248) 822-7800
douglas@bsplaw.com
turner@bsplaw.com

Thomas C. Hildebrand, Jr.
William G. DesChamps, IV
Paul Nicholas Nybo
Parker Poe Adams & Bernstein LLP
850 Morrison Drive, Suite 400
Charleston, SC, 29403
(843) 727-2650
tomhildebrand@parkerpoe.com
willdeschamps@parkerpoe.com
nicknybo@parkerpoe.com

Katon E. Dawson, Jr. (SC Bar #101167)
Parker Poe Adams & Bernstein LLP
1221 Main Street, Suite 1100
Columbia, SC, 29201
(803) 255-8000
katondawson@parkerpoe.com

Attorneys for Respondents



Katon E. Dawson, Jr.

t: 803.253.6854

f: 803.255.8017

katondawson@parkerpoe.com

Atlanta, GA

Charleston, SC

Charlotte, NC

Columbia, SC

Greenville, SC

Raleigh, NC

Spartanburg, SC

Washington, DC

RECEIVED
FEB 20 2024
SC Court of Appeals

February 20, 2024

Via Hand-Delivery and Email:

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201
ctappfilings@sccourts.org

Re: *Wedgewood Condominium Association vs. Centex Homes, et al.*

Appellate Case No.: 2023-001150

Trial Court Case No.: 2018-CP-26-00307

Dear Mrs. Kitchings:

Enclosed for filing in the *Wedgewood Condominium Association vs. Centex Homes, et al.*, Appellate Case No. 2023-001150, please find one bound copy of Respondents' Final Brief and a Proof of Service. An unbound copy of the Respondents' Final Brief is being filed electronically.

Should you have any questions or need anything further, please do not hesitate to contact me.

Sincerely,

s/Katon E. Dawson, Jr.

Katon E. Dawson, Jr.

KED/tlc

cc: Gene M. Connell, Jr. (via email and U.S. Mail)

L. Sidney Connor, IV (via email and U.S. Mail)

Stacy L. Stanley (via email and U.S. Mail)