

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

RECEIVED

FEB 21 2024

SC 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. 2023-001150

Wedgewood Condominium Association, Appellant

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 WHOM:

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

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 the **Final Brief of Appellant** on the 20th day 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

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

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 20th day of February, 2024.

Barbara A. Smith
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 20, 2024

RECEIVED
FEB 21 2024
SC Court of Appeals

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

Re: Appellate Case No. 2023-001150
Wedgewood Condominium Association v. Centex Homes, et al.
C/A No. 2018-CP-26-00307
Our File No. 2018-0272C

Dear Ms. Kitchings:

I enclose for filing an original (unbound) and one copy (bound) of the following documents for filing in the above-captioned:

- Record on Appeal with Certificate of Counsel;
- Final Brief of Appellant with Certificate of Counsel and Proof of Service;
- Final Reply Brief of Appellant with Certificate of Counsel and Proof of Service.

Please return a filed copy of the Proof of Service of each brief in the self-addressed, stamped envelope provided.

By copy of this letter, we hereby serve the Final Brief of Appellant and the Final Reply Brief of Appellant on Respondent, by delivery to attorneys of record. The Record on Appeal was previously served on the Respondent on January 31, 2024 and Proof of Service provided to the Court pursuant to Rule 210(a).

Sincerely yours,


Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures

The Honorable Jenny Abbot Kitchings
February 20, 2024
Page 2

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

Kelaker, Connell & Connor, PC

1500 US HIGHWAY 17 NORTH, SUITE 209

POST OFFICE DRAWER 14547

SURFSIDE BEACH, SC 29587

To:

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