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May 26 2022

SC Court of Appeals

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

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

Clifton B. Newman, Circuit Court Judge
Walton J. McLeod IV, Circuit Court Judge

Appellate Case No. 2020-001406
Civil Action No. 2017-CP-32-02204

ARM Quality Builders, LLC, d/b/a ARM Quality Builders, Appellant,

v.

Joseph A. Golson and Lycia B. Golson and Branch Banking Trust Company, Respondents,

AND

Joseph A. Golson and Lycia B. Golson, Third-Party Respondents,

v.

Ahmad Mazloom, Third-Party Appellant.

CONSENT APPENDIX II TO RECORD ON APPEAL

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CONSENT TO SUPPLEMENT THE RECORD ON APPEAL

By and through the undersigned counsel, all parties consent to the supplementation of the Record on Appeal as contained herein, pursuant to Rule 212(b), SCACR, and the Court's order of May 19, 2022.

May 26, 2022
Lexington, South Carolina

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MULLINS, ESQUIRE

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72873.1	08/15/2018	10	P	2	150.00	0.50	75.00	E FILE MOTION DISSOLVE MECHANICS LIEN AND CORRESPONDENCE TO OPPOSING COUNSEL REGARDING OUTSTANDING DISCOVERY	196
72873.1	08/20/2018	10	P	2	150.00	0.10	15.00	ATTENTION TO CORRESPONDENCE FROM OPPOSING COUNSEL REGARDING OUTSTANDING DISCOVERY	197
72873.1	08/21/2018	10	P	2	150.00	1.00	150.00	RECEIPT AND REVIEW OF SUPPLEMENTAL DISCOVERY RESPONSES/ CREDIT CARD STATEMENTS PRODUCED BY DEFENDANT	198

72873.1	08/22/2018	10	P	2	150.00	0.20	30.00	ATTENTION TO SCHEDULING OF HEARING ON MOTION TO DISSOLVE LIEN	199
72873.1	08/24/2018	10	P	2	150.00	0.60	90.00	MULTIPLE CORRESPONDENCE WITH OPPOSING COUNSEL REGARDING OUTSTANDING DEFICIENCIES WITH CREDIT CARD STATEMENTS PRODUCED BY DEFENDANT	200
72873.1	08/29/2018	10	P	2	150.00	0.30	45.00	RECEIPT AND REVIEW OF ORDER OF PROTECTION AND CONTINUANCE OF HEARING ON MOTION TO DISSOLVE LIEN	201
72873.1	09/08/2018	10	P	2	150.00	0.30	45.00	ATTENTION TO CORRESPONDENCE TO/FROM COURT REGARDING REQUEST FOR EVIDENCE IN SUPPORT OF MOTION TO DISSOLVE LIEN	209
72873.1	09/10/2018	10	P	2	150.00	6.00	900.00	DRAFT AFFIDAVIT OF ATTORNEY'S FEES IN SUPPORT OF MOTION TO DISSOLVE LIEN; CONTINUED TO PREPARE EXHIBITS FOR MOTION TO DISSOLVE LIEN; RECEIPT AND REVIEW OF PLAINTIFF'S BRIEF ON DEFENDANTS' MOTION TO DISSOLVE LIEN; TRAVEL TO/FROM COURT AND ATTENDANCE AT HEARING ON MOTION TO DISSOLVE MECHANIC'S LIEN; [REDACTED]	210
72873.1	09/11/2018	10	P	2	150.00	0.40	60.00	ATTENTION TO DEADLINE TO SUBMIT PROPOSED ORDERS [REDACTED]	211
72873.1	09/13/2018	10	P	2	150.00	0.30	45.00	ATTENTION TO CORRESPONDENCE FROM COURT REQUESTING ADDITIONAL DOCUMENTS RELATING TO MOTION TO DISSOLVE LIEN AND DRAFT REPLY CORRESPONDENCE WITH ADDITIONAL EVIDENCE FOR THE COURT'S CONSIDERATION	212
72873.1	09/13/2018	10	P	2	150.00	2.60	390.00	TELEPHONE CALL WITH CLIENT [REDACTED]	213
72873.1	09/18/2018	10	P	2	150.00	0.30	45.00	RECEIPT OF CORRESPONDENCE FROM OPPOSING COUNSEL TO COURT REGARDING POST-HEARING SUBMISSION IN SUPPORT OF MOTION TO DISSOLVE MECHANIC'S LIEN AND DRAFT REPLY CORRESPONDENCE TO COURT REGARDING THE SAME	214
72873.1	09/18/2018	10	P	2	150.00	2.50	375.00	CONTINUED TO RESEARCH RELEVANT CASELAW AND DRAFT PROPOSED ORDER GRANTING MOTION TO DISSOLVE MECHANIC'S LIEN	215
72873.1	09/19/2018	10	P	1	150.00	3.00	450.00	BEGAN DRAFTING PROPOSED ORDER GRANTING MOTION TO DISSOLVE LIEN; RESEARCH AND REVIEW CASELAW IN SUPPORT OF THE SAME	216
72873.1	09/20/2018	10	P	1	150.00	4.50	675.00	CONTINUED DRAFTING AND FINALIZING PROPOSED ORDER GRANTING MOTION TO DISSOLVE MECHANIC'S LIEN; MULTIPLE CORRESPONDENCE TO/FROM COURT REGARDING CLARIFICATION OF DEADLINE TO SUBMIT ORDERS ON MOTION TO DISSOLVE LIEN	217
72873.1	09/21/2018	10	P	1	150.00	5.00	750.00	FINALIZE PROPOSED ORDER GRANTING MOTION TO DISSOLVE LIEN AND MULTIPLE CORRESPONDENCE TO/FROM COURT REGARDING THE SAME; MULTIPLE CORRESPONDENCE TO/FROM COURT AND OPPOSING COUNSEL REGARDING ROSTER MEETING AND REQUEST FOR STATUS CONFERENCE AND DATE CERTAIN; RECEIPT AND	218

							REVIEW OF PROPOSED ORDER OF PLAINTIFF ON DEFENDANTS' MOTION TO DISSOLVE LIEN		
72873.1	09/23/2018	10	P	2	150.00	0.10	15.00	CORRECT TYPE-O IN PROPOSED ORDER AND CORRESPONDENCE TO COURT REGARDING THE SAME	219
72873.1	09/23/2018	10	P	2	150.00	0.10	15.00	CORRECT TYPE-O IN PROPOSED ORDER AND CORRESPONDENCE TO COURT REGARDING THE SAME	225
72873.1	09/24/2018	10	P	2	150.00	2.00	300.00	BEGAN DRAFTING ITEMIZED STATEMENT OF ACCOUNT TO REFLECT ONLY FEES INCURRED IN CONNECTION WITH DEFENSE OF LIEN	226
72873.1	09/26/2018	10	P	2	150.00	0.40	60.00	BEGAN DRAFTING OUTLINE OF REPLY TO PLAINTIFF'S PROPOSED ORDER ON MOTION TO DISSOLVE LIEN	227
72873.1	09/27/2018	10	P	2	150.00	5.00	750.00	DRAFT LETTER IN REPLY TO PLAINTIFF'S PROPOSED ORDER ON MOTION TO DISSOLVE LIEN ; REVIEW LAW ON NOTARY REQUIREMENTS	228
72873.1	09/28/2018	10	P	2	150.00	2.00	300.00	REVISE REPLY TO PLAINTIFFS' PROPOSED ORDER ON MOTION TO DISSOLVE LIEN	224
72873.1	09/28/2018	10	P	2	150.00	4.00	600.00	REVISE REPLY TO PLAINTIFFS' PROPOSED ORDER ON MOTION TO DISSOLVE LIEN	229
72873.1	09/30/2018	10	P	2	150.00	0.60	90.00	FINALIZE REPLY TO PLAINTIFF'S PROPOSED ORDER FOR SUBMISSION TO COURT	223
72873.1	10/01/2018	10	P	1	150.00	0.30	45.00	ATTENTION TO CONTINUANCE OF ROSTER MEETING	235
72873.1	10/08/2018	10	P	1	150.00	0.20	30.00	ATTENTION TO CORRESPONDENCE TO/FROM OPPOSING COUNSEL REGARDING PLAINTIFF'S REQUEST FOR AN EXTENSION TO FILE REPLY TO PROPOSED ORDER ON MOTION TO DISSOLVE LIEN	231
72873.1	10/08/2018	10	P	12	150.00	0.10	15.00	RECEIPT AND REVIEW CORRESPONDENCE BETWEEN OPPOSING COUNSEL REGARDING PLAINTIFF'S REQUEST FOR AN EXTENSION TO FILE REPLY BRIEF	236
72873.1	10/09/2018	10	P	1	150.00	0.40	60.00	RECEIPT AND REVIEW OF PLAINTIFF'S RESPONSE TO DEFENDANTS' PROPOSED ORDER ON DEFENDANT'S MOTION TO DISSOLVE MECHANIC'S LIEN	232
72873.1	10/29/2018	10	P	1	150.00	0.20	30.00	CORRESPONDENCE TO COURT AND OPPOSING COUNSEL REGARDING SCHEDULING ORDER	233
72873.1	10/30/2018	10	P	1	150.00	0.40	60.00	DRAFT AND SUBMIT PROPOSED SCHEDULING ORDER	234
Total for Timekeeper 10					Billable	180.10	27,015.00	CAITLIN C. HEYWARD	
Timekeeper 25 BRIDGET STEELE (PARALEGAL 25)									
72873.1	09/10/2018	25	P	1	80.00	0.30	24.00	ATTENTION TO E-FILING AFFIDAVIT OF ATTORNEY'S FEES	202
Total for Timekeeper 25					Billable	0.30	24.00	BRIDGET STEELE (PARALEGAL 25)	
Timekeeper 30 KATIE GJENNESTAD (PARALEGAL 30)									
72873.1	10/19/2017	30	A	1	80.00	0.70	56.00	PREPARE LETTER AND CERTIFICATE OF SERVICE TO OPPOSING COUNSEL SERVING SUBPOENAS; FINAL PREPARATION AND ATTENTION TO	ARCH

SERVING SUBPOENAS VIA CERTIFIED MAIL

72873.1	10/25/2017	30	A	1	80.00	2.10	168.00	FINAL PREPARATION OF 14 SUBPOENAS; PREPARE LETTERS TO EACH COMPANY SERVING SAME VIA CERTIFIED MAIL; PREPARE LETTER AND CERTIFICATE OF SERVICE TO OPPOSING COUNSEL SERVING SUBPOENAS	ARCH
72873.1	11/01/2017	30	A	1	80.00	0.50	40.00	RECEIPT AND REVIEW DOCUMENTS FROM CLIENT; ATTENTION TO BATES LABELING SAME	ARCH
72873.1	11/09/2017	30	A	1	80.00	0.50	40.00	RECEIPT AND REVIEW SUBPOENA RESPONSE FROM FIRST CITIZENS BANK; ATTENTION TO CONVERTING AND COMBINING DOCUMENTS FOR REVIEW	ARCH
72873.1	11/28/2017	30	A	1	80.00	0.30	24.00	TELEPHONE CALL WITH CRYSTALLINE PRODUCTS REGARDING STATUS OF SUBPOENA RESPONSES	ARCH
72873.1	11/29/2017	30	A	1	80.00	0.30	24.00	PREPARE LETTER TO JOSH JOYNER SENDING COURTESY COPY OF WHITE KNOLL HEATING & AIR SUBPOENA	ARCH
72873.1	11/30/2017	30	A	1	80.00	1.50	120.00	PREPARE MULTIPLE SUPPLEMENTAL SUBPOENAS AND LETTERS SERVING SAME VIA CERTIFIED MAIL; PREPARE LETTER AND CERTIFICATE OF SERVICE TO SERVE SAME ON OPPOSING COUNSEL	ARCH
72873.1	12/13/2017	30	A	1	80.00	0.50	40.00	PREPARE LETTER TO FIRST CITIZENS BANK SERVING SUBPOENA; PREPARE LETTER AND CERTIFICATE OF SERVICE TO OPPOSING COUNSEL SERVING SAME	ARCH
72873.1	12/18/2017	30	A	1	80.00	0.50	40.00	TELEPHONE CALL WITH LATONYA WITH FIRST CITIZENS BANK REGARDING SUBPOENA; PREPARE FAX COVERSHEET AND LETTER WITH PROOF THAT PLAINTIFF'S MOTION TO QUASH WAS RESOLVED	ARCH
72873.1	12/19/2017	30	A	1	80.00	0.40	32.00	PREPARE LETTER TO VACUUM CENTER, INC. TO SERVICE SUBPOENA; [REDACTED]	ARCH
72873.1	12/19/2017	30	A	1	80.00	2.50	200.00	REVIEW, ORGANIZE AND ASSEMBLE SUBPOENAS AND SUBPOENAS RESPONSES INTO MULTIPLE NOTEBOOKS FOR REVIEW; ATTENTION TO BATES LABELING BMC EAST, LLC'S SUBPOENA RESPONSE	ARCH
72873.1	12/21/2017	30	A	1	80.00	1.00	80.00	DRAFT SUBPOENA TO STIER SUPPLY COMPANY; PREPARE LETTER TO STIER SERVING SAME; PREPARE CERTIFICATE OF SERVICE TO SERVE OPPOSING COUNSEL WITH SUBPOENA	ARCH
72873.1	12/28/2017	30	A	1	80.00	0.60	48.00	ATTENTION TO STATUS OF SUBPOENAS; PREPARE DOCUMENT OF OUTSTANDING SUBPOENAS	ARCH
72873.1	01/02/2018	30	A	1	80.00	1.00	80.00	PREPARE LETTERS TO G-T-G, LLC AND PROCTOR FOUNDATION & CONCRETE; PREPARE CERTIFICATE OF SERVICE TO SERVE OPPOSING COUNSEL WITH SAME; ATTENTION TO SERVING OPPOSING COUNSEL WITH GOLSON'S SECOND SET OF DISCOVERY	ARCH
72873.1	02/21/2018	30	A	1	80.00	1.00	80.00	PREPARE LETTER AND CERTIFICATE OF SERVICE TO OPPOSING COUNSEL SERVING SUBPOENA RESPONSES VIA HAND-DELIVERY AT MEETING ON FEBRUARY 23; UPLOAD SUBPOENA RESPONSES TO CD	ARCH
72873.1	03/06/2018	30	P	1	80.00	1.60	128.00	PREPARE MULTIPLE LETTERS TO ENTITIES SERVING SUBPOENAS VIA CERTIFIED MAIL AND	118

							PROCESS SERVER; PREPARE CERTIFICATE OF SERVICE SERVING OPPOSING COUNSEL WITH NOTICES OF DEPOSITIONS AND SUBPOENAS; DRAFT NOTICE OF DEPOSITIONS OF AHMAD MAZLOOM AND ARM QUALITY; EMAIL SAME TO CLIENT AND OPPOSING COUNSEL	
72873.1	03/09/2018	30	P	1	80.00	0.40	32.00 ATTENTION TO SCHEDULING COURT REPORTER FOR DEPOSITIONS OF PLAINTIFF AND FOUR ENTITIES ON MARCH 20, 2018	119
72873.1	03/14/2018	30	P	1	80.00	0.40	32.00 FINAL PREPARATION OF MOTION; ATTENTION TO FILING DEFENDANTS' MOTION TO COMPEL	120
72873.1	03/19/2018	30	P	1	80.00	1.50	120.00 PREPARATION OF DEPOSITIONS OF DEFENDANTS AND ENTITIES	121
72873.1	03/21/2018	30	P	1	80.00	1.40	112.00 TELEPHONE CALL WITH JAIME HUERTA RESCHEDULING DEPOSITION; PREPARE SUBPOENA TO J&M HUERTA, LLC REGARDING SAME; EMAIL TO JAIME HUERTA AND OPPOSING COUNSEL WITH SUBPOENA; ATTENTION TO SCHEDULING COURT REPORTER REGARDING SAME	122
72873.1	03/21/2018	30	P	1	80.00	0.20	16.00 ATTENTION TO SCHEDULING COURT REPORTER FOR DEPOSITION OF J&M HUERTA, LLC	123
72873.1	03/26/2018	30	P	1	80.00	0.40	32.00 RECEIPT AND REVIEW DEPOSITION TRANSCRIPT OF JASON KYZER, RICK CROLLEY AND JOSH HALL; ASSEMBLE SAME INTO NOTEBOOK	124
72873.1	05/08/2018	30	P	1	80.00	0.50	40.00 PREPARE FILE FOR MOTION'S HEARING	146
72873.1	05/09/2018	30	P	1	80.00	0.80	64.00 ATTENTION TO ORGANIZING AHMAD'S PERSONAL BANK RECORDS AND ASSEMBLE INTO NOTEBOOK FOR REVIEW	147
Total for Timekeeper 30					Billable	20.60	1,648.00	KATIE GJENNESTAD (PARALEGAL 30)
Timekeeper 32 ANGIE HOOK (PARALEGAL 32)								
72873.1	10/17/2017	32	A	1	80.00	0.80	64.00 BEGIN DRAFTING GOLSON'S ANSWERS AND RESPONSES TO PLAINTIFF'S FIRST INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS.	ARCH
72873.1	10/17/2017	32	A	1	80.00	0.60	48.00 PREPARE LETTER TO RANDY DAVIS AND CERTIFICATE OF SERVICE SERVING GOLSON'S FIRST DISCOVERY REQUESTS AND SERVE VIA EMAIL AND REGULAR MAIL; EMAIL SAME TO CLIENT; CALENDAR DUE DATE FOR PLAINTIFF'S RESPONSES.	ARCH
72873.1	10/24/2017	32	A	1	80.00	0.20	16.00 CONFERENCE WITH C. HEYWARD; ASSIST IN REVIEW OF DOCUMENTS PRODUCED BY PLAINTIFF AND CASE STATUS SHEET.	ARCH
72873.1	10/30/2017	32	A	1	80.00	3.30	264.00 REVIEW, ANALYZE AND PREPARE INDEX OF ALL DOCUMENTS PRODUCED BY PLAINTIFF INCLUDING CONSTRUCTION COSTS VIA VENDOR.	ARCH
72873.1	10/31/2017	32	A	1	80.00	2.20	176.00 ELECTRONICALLY COMBINE AND BATES LABEL DOCUMENT FROM CLIENTS; REVIEW AND PREPARE SUMMARY INDEX OF ALL DOCUMENTS.	ARCH
72873.1	11/02/2017	32	A	1	80.00	3.00	240.00 REDACT, ORGANIZE, BATES LABEL AND PREPARE DEFENDANTS' DOCUMENTS FOR PRODUCTION TO PLAINTIFF; PREPARE LETTER AND CERTIFICATE OF SERVICE SERVING DEFENDANTS' ANSWERS AND RESPONSES TO PLAINTIFF'S DISCOVERY; REVISE DEFENDANTS' ANSWERS AND RESPONSES TO PLAINTIFF'S DISCOVERY REQUESTS.	ARCH

72873.1	11/03/2017	32	A	1	80.00	1.00	80.00	CONTINUE WORKING ON REDACTING, BATES LABELING AND PREPARING GOLSONS' DOCUMENTS TO BE PRODUCED; REVISE DISCOVERY RESPONSES, LETTER TO RANDY DAVIS AND CERTIFICATE OF SERVICE	ARCH
Total for Timekeeper 32					Billable	11.10	888.00	ANGIE HOOK (PARALEGAL 32)	
Timekeeper 34 LACEY SEGARS (PARALEGAL 34)									
72873.1	03/29/2018	34	P	2	80.00	0.60	48.00	ATTENTION TO PREPARING NOTICE OF DEPOSITION; DRAFT CORRESPONDENCE AND CERTIFICATE OF SERVICE TO OPPOSING COUNSEL REGARDING DEPOSITION OF AHMAD; DRAFT CORRESPONDENCE TO OPPOSING COUNSEL AND CLIENT REGARDING SAME; DRAFT CORRESPONDENCE TO COURT REPORTER REGARDING SAME	127
72873.1	03/29/2018	34	P	2	80.00	0.50	40.00	ATTENTION TO DRAFTING NOTICE OF DEPOSITION, CERTIFICATE OF SERVICE AND CORRESPONDENCE TO OPPOSING COUNSEL REGARDING ARM QUALITY; DRAFT CORRESPONDENCE TO OPPOSING COUNSEL AND CLIENT REGARDING SAME; DRAFT CORRESPONDENCE TO COURT REPORTER REGARDING SAME	128
72873.1	08/07/2018	34	P	2	80.00	2.00	160.00	ATTENTION TO BATES LABELING DEFENDANTS' SUPPLEMENTAL RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION; ATTENTION TO SCHEDULING COURT REPORTER FOR 8/13 DEPOSITION; DRAFT EMAIL TO OPPOSING COUNSEL WITH NOTICE OF DEPOSITION AND SUPPLEMENTAL DOCUMENTS; DRAFT EMAIL TO CLIENT REGARDING SAME	188
72873.1	10/29/2018	34	P	2	80.00	0.30	24.00	ATTENTION TO DRAFTING PROPOSED CONSENT SCHEDULING ORDER FOR ASSOCIATE REVIEW	230
Total for Timekeeper 34					Billable	3.40	272.00	LACEY SEGARS (PARALEGAL 34)	
GRAND TOTALS									
					Billable	236.75	34,097.00		