

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

Case No. 2010-CP-10-9672

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AUG 02 2013

SC Court of Appeals

Hayden Jeffords, individually, and on behalf of All Others Similarly Situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, Leslie Anne O'Neal, Trivette C. Hatcher, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown, Plaintiffs,

Of Whom Harold S. McEwan, William Scanlon, Delia Scanlon, Steven Goldberg, Brent McClaine, McKenzie Hutaff, Lynn Harris, and Kenneth A. Brown are the Secondary Appellants,

And

Of Whom John Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher are the Respondents.

v.

East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC, a/k/a East Ridge Homes, LLC a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; East Coast Carpentry a/k/a ECC Contracting, LLC; Fuller Drywall & Paint, Ltd.; Delta Mechanical, Inc. a/k/a Carolina Delta Mechanical; Wasson Electric Heating & Air; Bay Club Homes, LLC; Terracon Consultants, Inc.; Salvador Rubalcaba d/b/a Rubalcaba Construction, Defendants,

Of Whom East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC, a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; and Kevin Ball are the Primary Appellants,

v.

East Bridge Lofts, LLC; Central 3, LLC; Creekstone Eastbridge, LLC; and Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; and Bay Club Homes, LLC; Third-Party Plaintiffs,

v.

Robert Wasson and Barbara Wasson, individually and d/b/a Wasson Electric Heating & Air; and Charleston Chimney Services, Inc., Third-Party Defendants.

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**PROOF OF SERVICE**

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YOUNG CLEMENT RIVERS, LLP  
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Russell G. Hines  
P.O. Box 993  
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*-and-*

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*Attorneys for Respondents John Zohlen,  
Mary Zohlen, Leslie Anne O'Neal, and  
Trivette C. Hatcher*

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**SC Court of Appeals**

I, Russell G. Hines, of Young Clement Rivers, LLP, do hereby certify that a copy of the Respondents' **Motion to Dismiss Certain Parties, with Request for Briefing to be Stayed or Otherwise Held in Abeyance Pending Action on Motion** was sent to all counsel via united states mail, postage pre-paid on July 31, 2013 addressed as follows:

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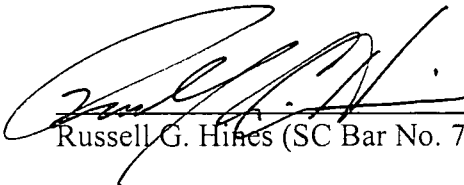
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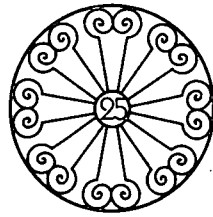
Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

  
\_\_\_\_\_  
Russell G. Hines (SC Bar No. 72100)

Charleston, South Carolina

Dated: 7/31/13



**YCR LAW**  
Young Clement Rivers, LLP

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Associate

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July 31, 2013

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Hayden Jeffords et al. vs. East Bridge Town Lofts et al.  
Circuit Case No.: 2010-CP-10-9672  
Appellate Case No.: 2012-213351  
YCR File No.: 14096-20090424

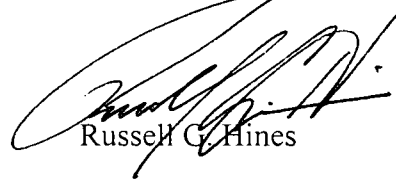
Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter please find the original and seven (7) copies of a **Motion to Dismiss Certain Parties, with Request for Briefing to be Stayed or Otherwise Held in Abeyance Pending Action on Motion** along with a **Proof of Service** for the same. In light of the relief requested in this filing we are also enclosing two (2) checks, each in the amount of \$25, to the extent that an additional filing fee is needed. Please return a stamped copy of the main document and proof of service in the envelope provided. Of course, if you have any questions or concerns, please let me know.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

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AUG 02 2013

**SC Court of Appeals**

RGH/jla

cc: (all below via U.S. Mail)

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The Honorable Jenny Abbott Kitchings

July 31, 2013

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