

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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APPEAL FROM Horry County
Court of Common Pleas

APR 17 2024

SC Court of Appeals

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, Inc.; 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 **Final Brief of Respondent** on the 16th day of April, 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

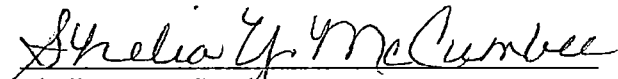
Katon E. Dawson, Jr. Esquire
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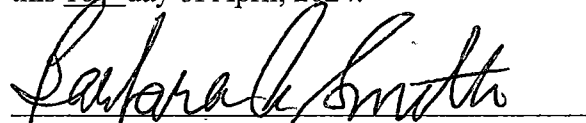
APR 17 2024

SC Court of Appeals



Shelia Y. McCumbee

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



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

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

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April 16, 2024

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SC Court of Appeals

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

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 for filing please find the original (unbound) and one bound copy of the Final Brief of Respondent with Certificate of Counsel and Proof of Service in the above-captioned case.

I also enclose an additional copy of the Proof of Service and would ask that a filed copy be returned to us in the self-addressed, stamped envelope provided.

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



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