

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

The Honorable John C. Hayes, III, Circuit Court Judge

Consolidated Appellate Case No. 2012-213730
Civil Action No. 2010-CP-46-02326

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SC Court of Appeals

Juontonio Pinckney, Trustee of the Pinckney Living Trust; Josephine Sciacca; Addie Smith; James and Deborah Barone; Gerry and Thomas Arcoria; Ismael and Valerie Gonzales; Vincent Longobardo; Joe and Sandra Moore; Barbara Musgrave; Allen and Edith Vesting; Thea-Eve Vicari; and Troy and Nancy Williams.....Appellants,

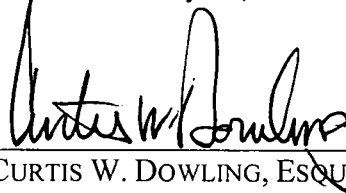
v.

Epcon Communities, Inc.; Epcon Communities Franchising, Inc.; Brock L. Fankhauser; Fankhauser Property Group, Inc.; Stonecrest Villas of Tega Cay, LLC; and Stonecrest Villas of Tega Cay Home Owners Association, Inc., Respondents.

RESPONSE IN SUPPORT OF MOTION TO FILE SEPARATE BRIEFS

The undersigned is defense counsel for Stonecrest Villas of Tega Cay Condominium Owners Association, Inc. ("Stonecrest COA") regarding the claims asserted against Stonecrest COA in the Appellants' Amended Complaint filed September 16, 2011. The undersigned agrees that separate briefs regarding the Circuit Court's Orders of January 23, 2013 and April 5, 2013 would aid the Court in understanding the separate and discrete issues addressed in the two Orders. Accordingly, the undersigned joins in the Motion to File Separate Briefs filed by Brett Dressler, Esquire, on or about

July 17, 2013, and requests that the Court grant the relief requested therein or the alternative relief requested in the Reply filed on or about July 30, 2013.



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July 31, 2013

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM YORK COUNTY
Court of Common Pleas

The Honorable John C. Hayes, III, Circuit Court Judge

Consolidated Appellate Case No. 2012-213730
Civil Action No. 2010-CP-46-02326

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PROOF OF SERVICE

I, the undersigned attorney with Barnes, Alford, Stork & Johnson, LLP, do hereby state that I have on July 31, served a copy of the enclosed **RESPONSE IN SUPPORT OF MOTION TO FILE SEPARATE BRIEFS** upon all other parties, through their attorney(s) of record, by depositing copies of the documents in the United States Mail, first class, sufficient postage prepaid, with the return address(es) clearly noted, addressed as follows:

J. Cameron Halford, Esquire
Halford, Niemiec & Freeman, LLP
238 Rockmont Drive
Fort Mill, SC 29708

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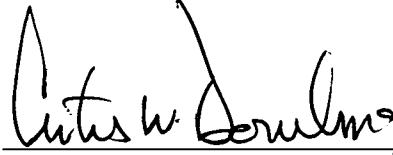
SC Court of Appeals

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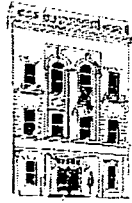
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July 31, 2013

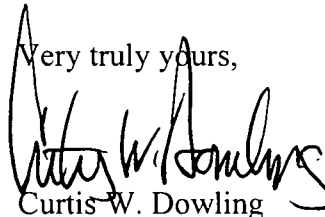
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Re: Juotonia Pickney, Josephine Sciacca, Addie L. Smith and James and
Deborah Barone v. Brock L. Fankhauser, et al.
Case No. 2010-CP-46-2326
BASJ File No. 76.18798
Client File No. 482181

Dear Ms. Kitchings:

I have enclosed the original and seven (7) copies of Stonecrest Villas of Tega Cay Condominium Owners Association, Inc.'s, Response in Support of Motion to File Separate Briefs. Please file the original and return a clocked-in copy to me in the envelope provided for your convenience. By copy of this letter, I am serving all counsel of record.

With best regards, I am

Very truly yours,

Curtis W. Dowling

CWD/djr
Enclosures

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Jenny Abbott Kitchings
July 31, 2013
Page 2

cc: J. Cameron Halford, Esquire
Graham P. Powell, Esquire
Michael B.T. Wilkes, Esquire/J. Derham Cole, Esquire
Brett E. Dressler, Esquire
Bradford W. Cranshaw, Esquire