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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeal

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
Hon. R. Scott Sprouse, Circuit Court Judge

Case No. 2019-CP-04-01942
Appellate Case No. 2023-001401

Natalie Zitek, individually, and on behalf of all others similarly situated; ..... Plaintiff,

v.

D.R. Horton, Inc., Jane Doe #1-10; and, John Doe #1-50, ...Defendant,

D.R. Horton, Inc., ...Appellant,

v.

AJ Landscaping & Grading LLC, A/K/A AJ Landscaping & Grading, Inc; Allpro Textures, LCC; Alpha Omega Construction Group, Inc.; American Concrete and Precast, Inc., A/K/A ACP Concrete, Inc.; A&J Framing, Inc; Alpha E.M.C; A-Z, Inc.; Atlanta Floor Designs Center; A Grade Above Others, LLC; Brand-Vaughan Lumber Co., Inc.; BKF Builders, Inc; Builders Designhouse, LLC; BMC East, LLC D/B/A Coleman Floor, LLC; Builders Firstsource Southeast Group, LLC,A/K/A Builders Firstsource, Inc; Bravo Carpenters, Inc.; Caryl Mechanics II, Inc.; Caryl Mechanicals, Inc.; Cannaday Siding and Gutter, Inc; Cortes Painting, LLC; CBU Enterprises, Inc.; CPI Security Systems, Inc.; Dom Group, LLC; Ferguson Enterprises, Inc.; Five Star Construction Inc.; Five Star Foundations, LLC; Galloway-Bell, Inc.; A/K/A Galloway-Bell, Inc. II BGET Floored, LLC; GBS Building Supply-Us LBM, LLC, A/K/A GBS Building Supply, Inc.; General Shale Brick Inc.; Greener Pastures, Inc. A/K/A Greener Pastures of Aiken, Inc; IBP Asset, LLC D/B/A Blue Ridge Building Products; JLS Masonry, Inc.; Kings Landscaping, LLC; Landshapers, LLC; Lade-Danler, Inc.; Lansing Building Products, Inc.; Long Heating & Air Conditioning, Inc.; L&M Electric, Inc.; Manale Landscaping, LLC; MJ Cowboys, LLC; M&L General Construction, LLC. A/K/A M&L General Construction, Inc.; M&Lreyna Construction, LLC; M&M Foundations, LLC; Nazareth Builders, LLC, NB Contractors, LLC; Poinsett Development, LLC; Poinsett Homes, LLC; P&T Construction, LLC; P&L Enterprises, LLC; Probuild Company, A/K/A Probuild

Holdings, Inc.; Rite Rug Co.; Rodney Howard Grading Co.; Sandlapper Concrete, LLC; Sodfather, Inc., Landscape Contractors; Stock Building Supply, LLC; Topbuild Home Services, Inc, A/K/A Gale Gale Contractors Service; Tucker Materials, Inc., A/K/A Gypsum; UTM Enterprises, Inc., Dupree Plumbing Company, Inc.; Willow Tree Landscaping, Inc., ...Third-Party Defendants,

of which Builder Services Group (f/k/a Masco Contractor Services Central Inc. f/k/a Gale Industries, Inc. d/b/a Gale Contractors Services)[1] and IBP Assets, LLC d/b/a Blue Ridge Building Products, are the ..... Respondents.

RESPONDENTS' CROSS-MOTION TO STRIKE

Respondents IBP Assets, LLC d/b/a Blue Ridge Building Products (hereinafter "Blue Ridge") and Builder Services Group, Inc. d/b/a Gale Contractors Services (hereinafter "Gale") (collectively "Respondents") find it necessary to renew their motion to strike. In the alternative, Respondents request leave to file responses to DR Horton's new arguments.

PROCEDURAL POSTURE

Respondents object to DR Horton's recitation of the posture of this motion and offer the following counter-statement. (See Appellant's Mot. to Strike filed Oct. 29, 2024, pp. 3-4.) In summary form, Appellant D.R. Horton, Inc. (hereinafter "DR Horton") did not timely object to Respondents' briefs and designations for the record on appeal. Instead, DR Horton launched a new argument that was not raised to the trial court or in DR Horton's initial brief. When Respondents objected to the new argument, DR Horton escalated its attempts to construct and support its unpreserved argument and belatedly moved to strike matters from Respondents' briefs and designations.

[1] This is in improper name identification the entity should be listed as *Builder Services Group, Inc. d/b/a Gale Contractor Services*.

This appeal originally involved numerous rulings against DR Horton, many of which were mooted by a settlement by DR Horton to which Respondents were not parties. (DRH Init. Br. filed Feb. 8, 2024, p. 8, n.2.) Some of the orders from which DR Horton originally appealed may have involved trial proceedings, such as the motion to decertify the class and the trial plan order. DR Horton's settlement with the Zitek plaintiffs dramatically narrowed the scope of this appeal to include only the orders granting Respondents' dispositive motions.

In its initial brief, DR Horton quoted from a transcript of a proceeding that occurred after Respondents' motions for summary judgment were granted. (Id. at p. 14; see Joint Mot. to Strike filed June 12, 2024, p. 4.) DR Horton also argued that the "negligence rule" governing indemnity agreements does not apply because DR Horton was not negligent. (DRH Init. Br. filed Feb. 8, 2024, p. 15; see Joint Mot. to Strike filed June 12, 2024, p.4 n.3; Respondents' Reply filed June 25, 2024, pp. 5-6.)

In their briefs, Respondents cited the negligence verdict against DR Horton at the ensuing trial. They contended this was supported by the doctrine of law of the case. (Respondents' Reply filed June 25, 2024, pp. 5-6.) See Judy v. Martin, 381 S.C. 455, 674 S.E.2d 151 (Ct. App. 2009).

DR Horton made numerous representations in its reply briefs regarding the trial that followed the orders granting Respondents' dispositive motions. (DRH Reply to IBP filed May 13, 2024, pp. 9-10; DRH Reply to Gale filed May 13, 2024, p. 5 and n.1.) These were responsive to the references to the jury verdict.

But DR Horton then went a step further and argued that the trial court's rulings as to Respondents were inconsistent with its rulings as to other subcontractors. (Id.) DR Horton did not advance this argument in its initial brief on appeal. (DRH Init. Br. filed Feb. 8, 2024) As noted above, DR Horton's initial brief merely alluded to it in the Statement of the Case which, by Rule,

may not contain contested matters. Rule 208(b)(1)(B), SCACR. Also, this was done by quoting a portion of a hearing that occurred after Respondents' dispositive motions were granted. (DRH Init. Br. filed Feb. 8, 2024, p. 14.)

Respondents filed a Joint Motion to Strike on June 12, 2024. Respondents raised three concerns in that motion. First, they argued that materials relating to the trial court rulings as to other subcontractors are not material to this appeal. (Joint Mot., pp. 3-6.) Respondents moved to strike improper arguments concerning insurance that were not raised to the trial court. (Id. at pp. 6-7.) Third, Gale objected to a derogatory comment concerning its counsel. (Id. at p. 3.) [2]

DR Horton complained about the designation of the jury verdict in response to that motion. (DR Horton's Opp. Filed June 20, 2024, p. 5 ("If anything should be stricken, it should be IBP's argument and its inclusion of the jury verdict and Respondent Gale's statements and designation regarding the jury verdict.").) However, DR Horton did not file a cross-motion at that time; instead, Appellant waited four months to file its Motion to Strike.

On August 23, 2024, this Court filed an Order granting Respondents' Joint Motion to Strike. The Order clearly struck materials from the record that occurred after the orders were filed from which this appeal was taken. The jury verdict was also stricken from the record.

However, the Order is silent as to the other issues Respondents raised in their Joint Motion. Despite stating that Respondents' motion was granted, the specific terms of the Order could be read to grant only partial relief. Neither Order directly addresses the three issues raised in the Joint Motion to Strike. The Orders allow DR Horton to correct its reply briefs, however the Orders do not address their impact upon Respondents' briefs or DR Horton's initial brief.

[2] Despite refiling several times, DR Horton has not made any attempt to alleviate the offense and continues to push the offensive comments.

Counsel for Blue Ridge e-mailed counsel for DR Horton attempting to work out a resolution without further motions practice. (DR Horton Resp. filed Sept. 6, 2024, exhibit.) Receiving no response, Blue Ridge filed a Request for Clarification on September 4, 2024. Blue Ridge requested clarification as to the intended cut-off date. Clarification was also requested as to the effect of the Order on references in the briefs to stricken materials.

DR Horton did not file a cross-motion. Its response, filed September 6, 2024, did not raise any specific objections to Blue Ridge's requests for clarification.

However, DR Horton's revised reply briefs and designations reiterated its unpreserved "inconsistency" argument—this time based on earlier motions and orders. The new materials DR Horton designated were not brought to the trial court's attention in arguing the motions that are on appeal—they are just motions and orders concerning other parties to the trial court proceeding that are not parties to this appeal. It is clear from the record that D.R. Horton had several different Independent Contractor Agreements with its subcontractors so how the trial court ruled on motions involving other subcontractors has no place in this appeal. D.R. Horton's only purpose for including those arguments is to support its "inconsistent ruling" argument that it never included in its initial appeal brief and which is not properly before this court.

Blue Ridge's reply memorandum referenced DR Horton's revised briefs and designations and sought guidance as to the scope of this Court's Order. Specifically, Blue Ridge argued that due process requires an opportunity for Respondents to respond to new arguments raised for the first time in a reply brief on appeal. (Reply filed Sept. 10, 2024.)

On September 16, 2024, DR Horton filed a sur-reply. While professing to be responsive to Blue Ridge's request clarification as to this Court's ruling regarding new materials DR Horton designated while the Request for Clarification was pending, this filing went far beyond that. It

raised a host of new issues that were not before this Court. This sur-reply asserted arguments regarding Respondent Gale that were not a part of the Motion for Clarification. On September 17, 2024, Respondent Gale filed a letter with the court in response.

After the parties filed their revised final briefs, DR Horton filed another motion seeking to hold final briefing in abeyance. (Mot. filed Oct. 18, 2024.) DR Horton claimed that the parties were awaiting a ruling on whether portions of Respondents' briefs should be stricken. (Id.)

Blue Ridge responded by pointing out that DR Horton had not filed a motion to strike. (Response filed Oct. 21, 2024.)

Shortly thereafter, this Court issued its Amended Order (filed Oct. 21, 2024.) The Amended Order corrected a typographical error as to the cut-off date, but was otherwise identical to the August 23, 2024 Order.

DR Horton filed the pending Motion to Strike on October 29, 2024. After months of motion practice, two orders, and the filing of two sets of final briefs, DR Horton now seeks to strike portions of Respondents initial briefs.

On November 4, 2024, DR Horton filed yet another set of revised reply briefs and a revised designation. The briefs do not appear to substantially differ from the reply briefs they replaced. However, DR Horton's revised designation added thirteen (13) motions and orders in the trial court relating to non-parties to this appeal. (DRH Rev. Designation filed Nov. 4, 2024, items 23 through 35.)

ARGUMENT

Final briefs and the record on appeal have all been filed. DR Horton's most recent filings demonstrate that it is attempting to leverage this Court's ruling on Respondents' Motion to Strike to the prejudice of Respondents. Respondents therefore seek affirmative relief in addition to the denial of DR Horton's pending motion.

The matters of which DR Horton complains of in its pending Motion to Strike are to some extent creatures of its own doing. Had DR Horton objected in a timely manner, Respondents could have requested leave to amend their briefs, and this appeal could have proceeded normally.

What DR Horton did was to use the materials in Respondents' briefs and designations—to which DR Horton only recently formally objected—as a pretext to raise an entirely new argument in its reply briefs, and to support it by designating irrelevant materials for the record. This creates a series of escalating problems.

First, Respondents were never provided the opportunity to correct the issues with their briefs to which DR Horton now objects. This Court's Orders struck the jury verdict from the record. DR Horton complains that Respondents' briefs cited the verdict, which has been stricken from the record. Although the Orders allowed DR Horton to correct its reply briefs, the Orders did not expressly allow Respondents to correct their briefs.

Next, DR Horton claims that the extraneous arguments and materials in its briefs and designations in reply are responsive to references to which it objects in Respondents' briefs. If Respondents are allowed to correct their briefs, then the pretext for the references to the trial and motions and orders relating to other subcontractors vanishes.

Now, after having claimed the advantage of its pretextual expansion of issues on appeal, DR Horton seeks to strike the allegedly offending portions of Respondents' briefs. After DR Horton filed this motion to strike, it designated numerous motions and orders that Respondents heretofore had no reason to read or consider. These motions and orders involve parties that are not part of this appeal.

The extreme prejudice to Respondents is compounded by the fact that DR Horton's "inconsistent rulings" argument was raised for the first time in a reply brief on appeal. At this

point, there is no mechanism for Respondents to respond to that argument on the merits. Yet it is axiomatic that Respondents have a right to respond to DR Horton's arguments on appeal.

Finally, there appears to be some confusion as to the intended scope of this Court's Orders. Both Orders state that the record on appeal "shall not contain . . . any materials that otherwise were not presented to the lower court *prior to, or in conjunction with*, its issuance of the order on appeal." (Amended Order filed Oct. 21, 2024, p. 2 (emphasis added).)

DR Horton seemingly reads this ruling narrowly to reach only materials not presented to the trial court until after the orders on appeal were filed. But this interpretation fails to account for Rule 209(b), SCACR, which provides that parties "shall not include any matter in his Designation which is not relevant to the appeal." Motions and orders concerning non-parties to this appeal do not gain relevance merely because DR Horton considers them to reflect inconsistent rulings. DR Horton has the burden of demonstrating that arguments concerning these materials were preserved for appeal. This burden has clearly not been met.

The posture of the motion practice in this appeal became somewhat confused when DR Horton filed its amended reply briefs and record. At that time, Blue Ridge's Motion for Clarification was pending, and that motion in part sought guidance as to the scope of the changes allowable in DR Horton's amended reply brief. (Req. for Clarification filed Sept. 4, 2024, p. 3, #3.a.) In a belated response brief, DR Horton sought relief that it has now renewed in its pending Motion to Strike. (Appellant's Resp. filed Sept. 16, 2024, p. 5 and Attachment B.)

This Court's Orders could be interpreted to reflect that the Court was unable to grant complete relief because the appropriate motions had not been filed. Accordingly, Respondents hereby cross-move to either strike portions of DR Horton's briefs or allow supplemental briefing.

I. Motion to Strike

The ground for this motion is stated in Blue Ridge's Reply in Support of Request for Clarification filed September 10, 2024, which is incorporated herein. Essentially, Respondents contend that DR Horton raised and developed an "inconsistency" argument in its reply brief on appeal to which they never had any opportunity to respond. This was the stated reason for Respondents' Joint Motion to Strike (filed June 12, 2024, p. 3.).

It is black-letter law that appellate courts will not consider arguments raised for the first time in a reply brief on appeal. Glasscock, Inc. v. U.S. Fid. & Guar. Co., 348 S.C. 76, 81, 557 S.E.2d 689, 692 (Ct. App. 2001); State v. Daise, 421 S.C. 442, 451, 807 S.E.2d 710, 714 (Ct. App. 2017); Zinn v. CFI Sales & Mktg., Ltd, 415 S.C. 93, 113, 780 S.E.2d 611, 621–22 (Ct. App. 2015); SPUR at Williams Brice Owners Ass'n, Inc. v. Lalla, 415 S.C. 72, 92, 781 S.E.2d 115, 126 (Ct. App. 2015); Simmons v. SC STRONG, 402 S.C. 166, 173 n.2, 739 S.E.2d 631, 635 n.2 (Ct. App. 2013); Beaufort Cnty. Sch. Dist. v. United Nat. Ins. Co., 392 S.C. 506, 525, 709 S.E.2d 85, 95 (Ct. App. 2011); Pruitt v. Pruitt, 389 S.C. 250, 269, 697 S.E.2d 702, 712 (Ct. App. 2010); Normandy Corp. v. S.C. Dep't of Transp., 386 S.C. 393, 407 n.7, 688 S.E.2d 136, 144 n.7 (Ct. App. 2009). "A reviewing court looks only to the initial brief on appeal for the issues presented because those are the arguments and authority to which the respondent has an opportunity to respond in the respondent's brief." Breckenridge Prop. Fund 2016, LLC v. Wally Enterprises, Inc., 170 Idaho 649, 657 n.2, 516 P.3d 73, 81 n.2 (2022) (citations omitted).

The specific argument must have been previously made to merit inclusion in a reply brief. Crawford v. Henderson, 356 S.C. 389, 409, 589 S.E.2d 204, 215 (Ct. App. 2003); see also Dukes v. Farrell, No. 2014-000730, 2017 WL 4619168, at *2 (S.C. Ct. App. Apr. 12, 2017) (unpublished opinion) ("Dukes did not raise this precise argument in his main brief. Therefore, it is not preserved

for review."). At a minimum, intent to raise an issue must be reasonably clear from the arguments in the initial brief. Zinn, 415 S.C. at 113, 780 S.E.2d at 621–22.

The scope of this appeal is determined by DR Horton's initial brief. Rule 208(b)(1)(B), SCACR. DR Horton did not raise an argument that the trial court ruled inconsistently, either to the trial court or in its initial brief on appeal. The only reference to inconsistent rulings occurred in DR Horton's "Summary of the Facts" section. (DRH Init. Br., p. 14.) That reference has been stricken. (Order filed Aug. 23, 2024.)

Therein lies the source of the briefing disconnect of which DR Horton complains. Its "Summary of the Facts" section in its Initial Brief quotes from a transcript that has been stricken from the record. This is improper and prejudicial.

Accordingly, Respondents move to strike the portion of DR Horton's initial brief containing the improper quotation. (See Exh. __ (from "Making matters worse… on page 13 to the end of the quotation on page 14.) The first paragraph in Blue Ridge's brief on page 12 of which DR Horton complains would be mooted if the corresponding portion of DR Horton's initial brief is stricken, and Blue Ridge would consent to remove that paragraph should this Court so rule.

DR Horton argues that its "inconsistent rulings" argument is responsive to Respondents' reference to the jury verdict at trial. (See DRH Init. Reply to IBP filed May 13, 2024, p. 9.) But the verdict has already been stricken from the record and DR Horton has now moved to strike any references to it. Moreover, it is unclear how DR Horton's inconsistency argument could be responsive to references to the verdict.

DR Horton raised and developed a new argument in its reply briefs that was not raised in conjunction with the trial court's rulings on Respondents' dispositive motions, and designated

multiple irrelevant documents in support of that argument. Having injected an improper issue into this appeal, DR Horton has fought tooth and nail to retain it.

Respondents are uncertain as to the mechanism by which an unpreserved argument in reply on appeal is to be brought to the attention of this Court. Respondents should not have to rely on this Court's *sua sponte* determination.

A motion to strike is appropriate when an appellant raises a new issue in a reply brief on appeal. Huston v. Comm'r of Employment and Economic Dev., 672 N.W.2d 606, 612 (Minn. Ct. App. 2003) ("When a new issue is raised in the reply brief, that portion of the brief should be stricken."). A New York court, in granting a motion to strike, opined as follows:

> [Sur-replies] are not allowed, but some remedy should be provided for such a situation as that in which the moving party is here placed. It has of late come within the observation of the court that some attorneys preparing briefs for appellants refrain from including in their original briefs points of vital importance, and, after they have received the respondents' answering briefs, they set forth in what they call 'replying briefs' the important matter omitted in the first instance. As no such thing as a rejoinder to a reply brief is permitted, it is obvious that in such a case the respondent is placed at a great disadvantage, and that the real purpose of requiring an exchange of briefs is frustrated. The reprehensible practice here referred to cannot be tolerated.
>
> Therefore, in such circumstances, applications will be entertained to have such so-called reply briefs, as are above referred to, removed from the files and withdrawn from the consideration of the court.

Ardolino v. Reinhardt, 128 A.D. 339, 339, 112 N.Y.S. 641 (App. Div. 1908)

Accordingly, Respondents move to strike the portions of DR Horton's amended reply briefs that advance its "inconsistent rulings" argument. Respondents also move to strike the documents that were not raised to the trial court in conjunction with Respondents' motions. DR Horton's insurance arguments, which were not raised to the trial court, should be stricken also for the reasons discussed above.

Specifically, Respondents move to strike items 23 through 35 from DR Horton's Revised Supplemental Designation of Record filed November 4, 2024. (See also Amended ROA filed Sept. 13, 2024, items 76, 77, 78, and 79 (JLS motions and orders).) Respondents also move to strike DR Horton's initial designation number 4, 35, and 36. They were not cited in DR Horton's initial brief and are relevant only to the unpreserved "inconsistent rulings" argument. (Amended ROA, items 7, 35, and 36 (AJ and Rite Rug motions and order). Respondents request that the offending portions of DR Horton's revised reply briefs be stricken. (See Exhibits A and B.)

If this Court strikes the portion of DR Horton's initial brief that quotes from the subsequent trial transcript, that alone might resolve this issue. Blue Ridge would remove the responsive paragraph from its brief. If Respondents are allowed to conform their briefs to this Court's Orders, the jury verdict issue may be resolved. That would remove the briefing disconnect of which DR Horton complains and also negate even the flimsy pretext for DR Horton's "inconsistent rulings" argument in reply.

II. Motion for Supplemental Briefing

Nevertheless, Respondents realize that striking portions of briefs is a drastic remedy, and it may lead to protracted motion practice. DR Horton's "inconsistent rulings" and insurance arguments lack merit, and they can be quickly put to rest. Respondents seek an opportunity to meaningfully respond to the arguments DR Horton raised for the first time in its reply briefs.

There is also some authority for the proposition that an appellate court may allow supplemental briefing in this situation. Owens v. Green, 400 Ill. 380, 407, 81 N.E.2d 149, 164 (1948); 4 C.J.S. Appeal and Error § 736 (May 2024 Update). The preservation of DR Horton's "inconsistent rulings" argument is highly disputed. This Court may need to review the briefing on the merits to resolve this issue. Supplemental briefing may therefore be appropriate.

Because both pending motions flow from DR Horton's objections to Respondents' initial briefs, Respondents request the opportunity to correct their briefs in light of this Court's October 21, 2024 Order (as set forth in Respondents' response to DR Horton's Motion to Strike) and their above-referenced motion to strike the reference to stricken materials in DR Horton's initial brief. This may moot many of the contested issues in the pending motions.

If this Court allows the currently-filed briefs and designations to stand, Respondents request leave to file supplemental briefs addressing DR Horton's newly-developed "inconsistent rulings" argument and, the improper insurance issues.

Alternatively, this Court may find it appropriate to strike the referenced portions of DR Horton's reply briefs and hold them in abeyance until Respondents' amended briefs are filed. If DR Horton again raises unpreserved and irrelevant arguments in amended reply briefs filed thereafter, Respondents reserve their right to seek appropriate relief at that time.

If this Court is inclined to deny both pending motions, Respondents request that the motions and orders concerning the briefs and record be considered along with the merits of the appeal.

CONCLUSION

Since DR Horton has re-opened the issue of striking briefs, Respondents cross-move to strike DR Horton's arguments that were raised for the first time in its reply on appeal and references to materials that have been stricken from the record. These include the argument that the trial court ruled inconsistently and references to liability insurance. Alternatively, Respondents request leave to supplement their briefs to respond to these issues, or that the motions and orders relating to these issues be considered along with the merits of this appeal.

In sum, Respondents request the following:

1. The portion of DR Horton's initial brief quoting and referring to the trial transcript be stricken.
2. If this Court grants #1, Blue Ridge consents to remove the first redlined paragraph on page 12 of its brief. (See exhibit to DR Horton's October 29, 2024 Motion.)
3. If this Court is inclined to grant DR Horton's Motion to Strike, Respondents request the opportunity to conform their briefs to the Orders.
4. The portions of DR Horton's reply briefs that reference stricken materials, respond to references to the jury verdict, and raise improper insurance arguments be stricken.
5. The Court strike items 23 through 35 from DR Horton's Revised Supplemental Designation of Record filed November 4, 2024 as well as items 7,35, 36, 76,77,78, and 79 contained in the Amended ROA filed Sept. 13, 2024.

Respectfully submitted,

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