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**Jun 05 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

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Appellate Case No. 2025-001046

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Cambridge Building, Inc. (License No.  
117526)

Appellant,

v.

Robert S. Lotstein, Kristin Huffman, Robert S.  
Lotstein, Trustee of the Robert S. Lotstein  
Family Trust dated September 4, 2022, as  
Amended and Restated, and Kristin S.  
Huffman, Trustee of the Kristin S. Huffman  
Family Trust dated September 4, 2022, as  
Amended and Restated

Respondents.

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MOTION TO AMEND NOTICE OF APPEAL

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The Appellant respectfully moves this Honorable Court for leave to file an amended Notice of Appeal in the above-captioned matter. In support of this motion, Appellant states the following:

- (1) On February 25, 2025, the Honorable Benjamin H. Culbertson issued a Form 4 Order indicating Defendants' Motion to Dismiss was partially granted and directing Attorney Terry Finger to prepare an order.
- (2) Attorney Finger prepared a proposed order, which he sent to Judge Culbertson.
- (3) On March 7, 2025, counsel for the Plaintiff/Appellant filed a Motion to Alter or Amend and referenced the proposed order prepared by Attorney Finger. The proposed order had not been entered by Judge Culbertson.

- (4) On April 24, 2025, Judge Culbertson entered two orders: (1) a Form 4 Order denying Plaintiff's Motion to Alter or Amend (Form 4 Order denying Plaintiff's Motion to Alter or Amend); and (2) Order on Defendants' Motion to Dismiss filed April 24, 2025, which is in substance the same as Mr. Finger's proposed order.
- (5) On May 5, 2025, Plaintiff/Appellant filed a Motion to Alter or Amend/Reconsider the Order filed April 24, 2025.
- (6) On May 27, 2025, Plaintiff/Appellant timely served and filed a Notice of Appeal of the prior orders.
- (7) On May 28, 2025, Judge Culbertson entered a Form 4 Order: Plaintiff's second Motion to Alter or Amend (entitled "Motion to Reconsider Order Granting, In Part, Defendant's Motion to Dismiss") filed May 5, 2025 is DENIED.
- (8) Appellant seeks the Court's permission to file an Amended Notice of Appeal to add the May 28, 2025 Order. A copy of the proposed Amended Notice of Appeal is attached as Exhibit A.
- (9) Respondents' counsel has consented to the filing of an amended notice of appeal. Terry Finger's email is attached as Exhibit B.

WHEREFORE, Appellant respectfully requests that this Court grant leave to amend the Notice of Appeal filed May 27, 2025.

**WALTERS LAW FIRM**

s/Lee Anne Walters

Lee Anne Walters (SC Bar No. 74984)

Post Office Box 1214

Beaufort, South Carolina 29901-1214

(843) 379-0973

Email: leeanne@walterslawsc.com

*Counsel for Appellant*

June 5, 2025

THE STATE OF SOUTH CAROLINA  
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Appellant,

v.

Robert S. Lotstein, Kristin Huffman, Robert S. Lotstein, Trustee of the Robert S. Lotstein Family Trust dated September 4, 2022, as Amended and Restated, and Kristin S. Huffman, Trustee of the Kristin S. Huffman Family Trust dated September 4, 2022, as Amended and Restated

Respondents.

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AMENDED NOTICE OF APPEAL

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Cambridge Building, Inc. amends its previously filed Notice of Appeal and hereby appeals the following orders issued by the Honorable Benjamin H. Culbertson:

- (1) Form 4 Order Partially Granting the Defendants' Motion to Dismiss filed February 25, 2025,
- (2) Order on Defendants' Motion to Dismiss filed April 24, 2025,
- (3) Form 4 Order denying Plaintiff's Motion to Alter or Amend filed April 24, 2025, and
- (4) Form 4 Order denying Plaintiff's Motion to Alter or Amend filed May 28, 2025.

Appellant's counsel received written notice of entry of the Order filed May 28, 2025, on that same date.

**EXHIBIT A**

**WALTERS LAW FIRM**

s/Lee Anne Walters

Lee Anne Walters (SC Bar No. 74984)

Post Office Box 1214

Beaufort, South Carolina 29901-1214

(843) 379-0973

Email: leeanne@walterslawsc.com

*Counsel for Appellant*

June 5, 2025

Other Counsel of Record:

Terry A. Finger  
Finger, Melnick, Brooks & LaBruce, P.A.  
PO Box 24005  
Hilton Head Island, SC 29925-4005  
tfinger@fingerlaw.com

*Counsel for Respondents*

Jesse Ryan Oates  
Sweeny Wingate & Barrow, PA  
PO Box 12129  
Columbia, SC 29211  
jro@swblaw.com

*Counsel for Cambridge Building, Inc. and  
Frank Guidobono*

**Subject:** RE: Cambridge Building, Inc. v. Robert S. Lotstein  
**Date:** Wednesday, June 4, 2025 at 11:35:35 AM Eastern Daylight Time  
**From:** Terry Finger  
**To:** Lee Anne Walters  
**CC:** Assistant, Amy Ostrom  
**Attachments:** image001.png

I consent to the Motion.

Terry



**Terry A. Finger** | Attorney at Law  
FINGER, MELNICK, BROOKS & LaBRUCE, P.A.

35 Hospital Center Common, Suite 200 | Post Office Box 24005  
Hilton Head Island, South Carolina 29925-4005  
D: (843)681-7004

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FDCPA: This firm is a debt collector attempting to collect a debt. Any information will be used for that purpose.

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**From:** Heid, Emily <[ehaid@sccourts.org](mailto:ehaid@sccourts.org)>  
**Sent:** Wednesday, June 4, 2025 10:04 AM  
**To:** [leeanne@walterslawsc.com](mailto:leeanne@walterslawsc.com); Terry Finger <[tfinger@Fingerlaw.com](mailto:tfinger@Fingerlaw.com)>  
**Cc:** [assistant@walterslawsc.com](mailto:assistant@walterslawsc.com); Amy Ostrom <[aostrom@fingerlaw.com](mailto:aostrom@fingerlaw.com)>  
**Subject:** Cambridge Building, Inc. v. Robert S. Lotstein

Good Morning,

Attached please find correspondence from the Court of Appeals.

Any parties not included in this email will receive the attached correspondence via US Mail.

**Do not respond to this email. Send all correspondence to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).**

Emily Heid

**EXHIBIT B**

Appeals Specialist I  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
Ph: (803) 734-1890

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**EXHIBIT B**

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Respondents

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PROOF OF SERVICE

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I certify that I served the **Motion to Amend Notice of Appeal** on the following counsel of record at the email address listed in the Attorney Information System on June 5, 2025.

Terry A. Finger  
Post Office Box 24005  
Hilton Head Island, SC 29925-4005  
Email: [tfinger@fingerlaw.com](mailto:tfinger@fingerlaw.com)

**WALTERS LAW FIRM**

*s/Lee Anne Walters*

Lee Anne Walters (S.C. Bar No. 74984)

Post Office Box 1214

Beaufort, SC 29901

**EMAIL: [LEEANNE@WALTERSLAWSC.COM](mailto:LEEANNE@WALTERSLAWSC.COM)**

JUNE 5, 2025

**Subject:** (Appellate Case No. 2025-001046) Cambridge Building, Inc. v Lotstein et al. 2024CP072002 (Appellate Case No.)  
**Date:** Thursday, June 5, 2025 at 4:09:47 PM Eastern Daylight Time  
**From:** Lee Anne Walters  
**To:** Terry Finger, Ryan Oates  
**CC:** Amy Ostrom  
**Attachments:** 250605 Motion to file amended NOTICE OF APPEAL.pdf, Ex A- 250602 amended NOTICE OF APPEAL.pdf, Ex B Terry Finger Consent.pdf

Terry:

Attached for service is a Motion to Amend the Notice of Appeal in *Cambridge Building Inc. v. Robert Lotstein* (Appellate Case No. 2025-001046).

As always, I am happy to discuss any concerns.

Best,

**Lee Anne Walters** | Attorney at Law  
Walters Law | Post Office Box 1214 | Beaufort, SC 29901  
o. 843.379.0973 | d. 843.670.0909 | [leeanne@walterslawsc.com](mailto:leeanne@walterslawsc.com)

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**From:** Lee Anne Walters <[leeanne@walterslawsc.com](mailto:leeanne@walterslawsc.com)>  
**Date:** Tuesday, June 3, 2025 at 12:21 PM  
**To:** Terry Finger <[tfinger@fingerlaw.com](mailto:tfinger@fingerlaw.com)>, Ryan Oates <[jro@swblaw.com](mailto:jro@swblaw.com)>  
**Cc:** Amy Ostrom <[aostrom@fingerlaw.com](mailto:aostrom@fingerlaw.com)>  
**Subject:** (Appellate Case No. 2025-001046) Cambridge Building, Inc. v Lotstein et al. 2024CP072002 (Appellate Case No.)

Terry:

Attached for service is an Amended Notice of Appeal in *Cambridge Building Inc. v. Robert Lotstein* (Appellate Case No. 2025-001046).

As always, I am happy to discuss any concerns.

Best,

**Lee Anne Walters** | Attorney at Law

Walters Law | Post Office Box 1214 | Beaufort, SC 29901  
o. 843.379.0973 | d. 843.670.0909 | [leeanne@walterslawsc.com](mailto:leeanne@walterslawsc.com)

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**From:** Lee Anne Walters <[leeanne@walterslawsc.com](mailto:leeanne@walterslawsc.com)>  
**Date:** Tuesday, May 27, 2025 at 2:18 PM  
**To:** Terry Finger <[tfinger@Fingerlaw.com](mailto:tfinger@Fingerlaw.com)>  
**Subject:** Cambridge Building, Inc. v Lotstein et al. 2024CP072002

Terry:

Please find for service the notice of appeal in *Cambridge Building Inc. v. Robert Lotstein*. I will file with the Court of Appeals and the Circuit Court shortly.

As always, I am happy to discuss any concerns.

Best,

**Lee Anne Walters** | Attorney at Law  
Walters Law | Post Office Box 1214 | Beaufort, SC 29901  
o. 843.379.0973 | d. 843.670.0909 | [leeanne@walterslawsc.com](mailto:leeanne@walterslawsc.com)

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