

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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MAY 16 2014

SC Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Trial Court Case No. 2009-CP-22-1045

APPELLATE CASE NO. 2013-001644

John Steven Goodwin, Louise C. Goodwin, Thomas L. Puckett and Branda C. Puckett, Robert Nahama and Jeanne E. Nahama, Thomas Holland and Sharon Louise Holland, Joyce K. Sobel, Robert W. Waruszewski, Richard N. Taylor, Robert K. Spillers (a/k/a Robert Spillers), and Deborah T. Spillers (a/k/a Deborah Spillers), Patrick A. DiAngelo and Deborah A. DiAngelo, Gary E. Owens and Joyce M. Owens, Fount L. Shults and Lynda M. Shults, and Dennis Ridgeway and Teresa Lynn Ridgeway, Appellants

v.

Landquest Development, LLC, Kyle V. Corkum, South Bay Properties, LLC, C. R. Thompson and Sons, LLC, Ronald L. Charlton, Bonnie N. Charlton, James R. Charlton and Bayside Property, Inc., the City of Georgetown, Hartford Casualty Insurance Company, Hartford Fire Insurance Company, and National Land Sales, Inc., f/k/a Source One Communities, LLC, a/k/a South One Signature Communities, Respondents

**DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

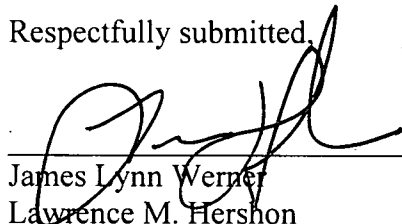
Respondents Hartford Casualty Insurance Company and Hartford Fire Insurance Company (collectively, "Hartford Respondents") by and through their undersigned counsel, propose the following be included in the Record on Appeal:

1. Complaint dated July 9, 2009;
2. Answer to Complaint by Hartford Defendants, dated November 10, 2009;

3. Notice of Motion and Motion for Continuance, dated July 12, 2011;
4. Order Granting Motion for Continuance, dated July 20, 2011;
5. Order Striking Action, dated July 22, 2011;
6. Notice of Motion and Motion to Reinstate/Restore Complaint and Lis Pendens and to Consolidate Separate Trials, dated January 21, 2013;
7. Order Denying Motions to Restore and to Continue, dated March 26, 2013;
8. Motion to Alter or Amend Judgment dated April 10, 2013;
9. Order Denying Motion to Alter or Amend Judgment dated June 19, 2013;
10. Transcript of Hearing Held March 7, 2013, pp 4 to 29;
11. Subdivision Performance Bond, dated July 17, 2007;
12. Agreement between City of Georgetown and Hartford Fire Insurance Company, dated August 20, 2013;
13. Construction Contract between Hartford Fire Insurance Company and R.H. Moore Company, Inc., dated December 11, 2013;
14. Notice to Proceed, effective January 13, 2014;
15. The City of Georgetown's Land Development Regulations, 2008 Revision.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,



James Lynn Werner

Lawrence M. Hershon

Parker Poe Adams & Bernstein LLP

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ATTORNEYS FOR RESPONDENTS
HARTFORD CASUALTY INSURANCE
COMPANY AND HARTFORD FIRE
INSURANCE COMPANY

May 16, 2014
Columbia, South Carolina

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v.

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PROOF OF SERVICE

The undersigned hereby certifies that on May 16, 2014, he served the foregoing **DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL AND THE INITIAL BRIEF OF HARTFORD RESPONDENTS** on all counsel of record by placing a copy of it in the United States Mail, first class postage prepaid, addressed as follows:

K. Douglas Thornton, Esq.
Thornton Law Firm, LLC
1025 Third Avenue
Conway, SC 29526

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Law Offices of John M. Leiter, PA
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Myrtle Beach, SC 29577

Charles T. Smith, Esq.
608 Cypress Street
Georgetown, SC 29440

Joseph Kevin Qualey, Esq.
Qualey & Beck
23 Broad Street
Charleston, SC 29401

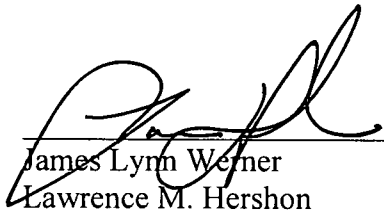
Ronald L. Richter, Jr., Esq.
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[SIGNATURE BLOCK APPEARS ON FOLLOWING PAGE.]



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HARTFORD CASUALTY INSURANCE
COMPANY AND HARTFORD FIRE
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May 16, 2014
Columbia, South Carolina



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Charleston, SC
Charlotte, NC
Columbia, SC
Raleigh, NC
Spartanburg, SC

May 16, 2014

Via Hand Delivery

The Honorable Jenny Abbott Kitchings
Clerk, Court of Appeals
1015 Sumter Street
Columbia, SC 29211

**Re: John Steven Goodwin et al. v. Landquest Development, LLC et al.
Trial Court Case No. 2009-CP-22-1045
Appellate Case No. 2013-001644**

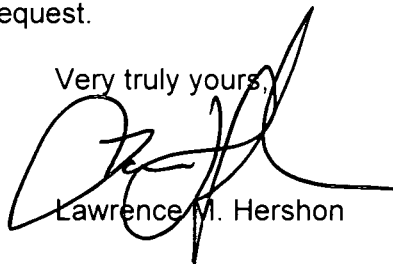
Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Respondents Hartford Casualty Insurance Company's and Hartford Fire Insurance Company's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service. Please return a file-stamped copy of the Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service to my courier.

By copy of this letter, I am today serving the Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service on counsel for Appellants and the other Respondents.

Thank you for your attention to this request.

Very truly yours,



Lawrence M. Hershon

LMH:dmc
Enclosure

cc: K. Douglas Thornton, Esq. (w/enc.) – via U.S. Mail
John M. Leiter, Esq. (w/enc.) – via U.S. Mail
Charles T. Smith, Esq. (w/enc.) – via U.S. Mail
Joseph Kevin Qualey, Esq. (w/enc.) – via U.S. Mail
Ronald L. Richter, Jr., Esq. (w/enc.) – via U.S. Mail
Elise Freeman Crosby, Esq. (w/enc.) – via U.S. Mail
Andrew F. Lindemann, Esq. (w/enc.) – via U.S. Mail
Kristin G. Atkins, Esq. (w/enc.) – via U.S. Mail

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