

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM GEORGETOWN COUNTY
Benjamin H. Culbertson, Circuit Court Judge

SC Court of Appeals

Case No. 2009-CP-22-1045

John Steven Goodwin, Louise C. Goodwin, Thomas I. Puckett and
Brenda 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, 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 Source One
Signature Communities, Respondents.

**RESPONDENT CITY OF GEORGETOWN'S
DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

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The Respondent City of Georgetown proposes that the following be included in the Record on Appeal:

1. Order filed March 27, 2013
2. Order filed June 21, 2013
3. Form 4 Order filed July 22, 2011
4. Complaint
5. Notice of Appeal
6. Transcript of Hearing, March 7, 2013, pp. 1-29
7. Transcript of Hearing, June 6, 2013, pp. 1-29
8. Motion to Reinstate/Restore Complaint, filed January 22, 2013 (with attachments)
9. Order of the Hon. Jasper Cureton filed April 16, 2014
10. Respondent City of Georgetown's Motion to Dismiss Appeal filed February 10, 2014
11. Respondent City of Georgetown's Memorandum in Support of Motion to Dismiss Appeal filed February 10, 2014
12. Respondent City of Georgetown's Reply Memorandum in Support of Motion to Dismiss Appeal filed February 10, 2014 (with attachment)
13. Respondents Hartford Casualty Insurance Company's and Hartford Fire Insurance Company's Memorandum of Law in Support of their Motion to Dismiss Appeal, with all attachment including Affidavit of Lawrence Hershon

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

DAVIDSON & LINDEMANN, P.A.

BY: 

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Columbia, South Carolina

May 16, 2014

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APPEAL FROM GEORGETOWN COUNTY
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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 Source One Signature Communities, Respondents.

CERTIFICATE OF SERVICE

The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Respondent City of Georgetown, does hereby certify that service of the **Initial Brief of Respondent City of Georgetown and Respondent City of Georgetown's Designation of Matter to be Included in the Record on Appeal** in the above-

captioned matter was made upon all counsel of record by placing copies in the United States Mail, first class postage prepaid, at the below listed addresses clearly indicated on said envelope this the 16th day of May 2014:

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May 16, 2014

Of Counsel
Kenneth P. Woodington

Writer's Email: alindemann@dml-law.com

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: John Steven Goodwin, *et al.* v. Landquest Development, LLC, *et al.*
SCCA Case Number: 2013-001644
Civil Action Number: 2009-CP-22-1045
Our File Number: 79.7959

Daer Ms. Kitchings:

Please find enclosed for filing the originals and one copy each of the **Initial Brief of Respondent City of Georgetown** and **Respondent City of Georgetown's Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. Please file the originals and return a clocked-in copy of each document to me in the enclosed envelope.

By copy of this letter, I am serving copies on all counsel of record.

Thank you for your assistance in this matter.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

AFL/jmb
Enclosures

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
May 16, 2014
Page Two

cc: John M. Leiter, Esquire (*w/ Enclosures*)
K. Douglas Thornton, Esquire (*w/ Enclosures*)
Charles T. Smith, Esquire (*w/ Enclosures*)
James Lynn Werner, Esquire (*w/ Enclosures*)
Lawrence M. Hershon, Esquire (*w/ Enclosures*)
Joseph K. Qualey, Esquire (*w/ Enclosures*)
Donald G. Hunt, Jr., Esquire (*w/ Enclosures*)
Kristen G. Atkins, Esquire (*w/ Enclosures*)
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