

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

Juontonio Pinckney, Trustee of the Pinckney Living Trust; Josephine Sciacca; Addie Smith; James and Deborah Barone; Ismael and Valerie Gonzales; and Joe and Sandra MooreAppellants,

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.

**RESPONDENT STONECREST VILLAS OF TEGA CAY
CONDOMINIUM OWNERS ASSOCIATION, INC.'S
REPLY IN SUPPORT OF MOTION TO STRIKE
FINAL AMENDED BRIEF OF APPELLANTS**

The Respondent, Stonecrest Villas of Tega Cay Condominium Owners Association, Inc. (incorrectly identified in the caption as “Stonecrest Villas of Tega Cay Home Owners Association, Inc.”) (“Stonecrest COA”), through its undersigned counsel and pursuant to Rule 240(f), SCACR, submits this brief Reply in Support of its Motion to Strike Final Amended Brief of Appellants.

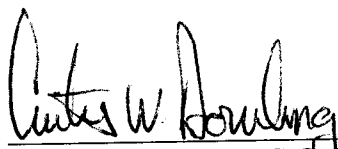
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SC Court of Appeals

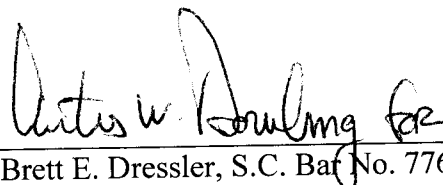
The Appellants admit their Final Amended Brief violates Rule 211(b), SCACR, yet they argue their error was insignificant and should, therefore, be disregarded as harmless. Even if the revisions were *de minimis*—a review of the bulleted list in Stonecrest COA's motion clearly demonstrates they were not—neither Rule 211(b) nor this Court's April 24, 2014 Order permit any alterations in a final brief aside from updated record citations and the correction of typographical errors and misspellings.

Accordingly, Stonecrest COA respectfully requests that its motion be granted.



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May 30, 2014



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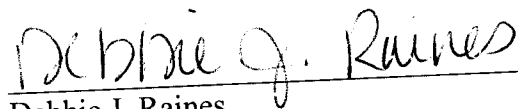
PROOF OF SERVICE

I, the undersigned attorney with Barnes, Alford, Stork & Johnson, LLP, do hereby state that I have on May 30, 2014 served a copy of the **REPLY IN SUPPORT OF RESPONDENT STONECREST VILLAS OF TEGA CAY CONDOMINIUM OWNERS ASSOCIATION, INC.'S MOTION TO STRIKE FINAL AMENDED BRIEF OF APPELLANTS** 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:

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(1930-2008)

May 30, 2014

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Post Office Box 11629
Columbia, SC 29211

Re: Juontonio Pickney et al. v. Epcor Communities, Inc. et al.
Consolidated Appellate Case No. 2012-213730
Case No. 2010-CP-46-02326
BASJ File No. 76.18798
Client File No. 482181

Dear Ms. Kitchings:

Enclosed please find the below-described documents pertaining to the above-referenced matter.

1. The original and nine (9) copies of a Reply in Support of Respondent Stonecrest Villas of Tega Cay Condominium Owners Association Inc.'s Motion to Strike Final Amended Brief of Appellants. Please file the original and six (6) copies and return three (3) clocked copies with our courier.
2. The original and one (1) copy of the Proof of Service pertaining to the aforementioned reply. Please file the original and return the clocked copy with our courier.

By copy of this letter, I am serving all counsel of record. Thank you for your assistance in this matter.

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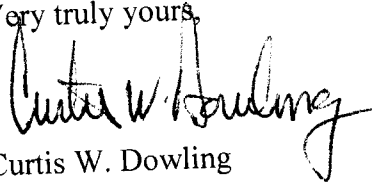
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SC Court of Appeals

BARNES ALFORD STORK & JOHNSON L.L.P.
The Honorable Jenny Abbott Kitchings
May 30, 2014
Page 2

With best regards, I am

Very truly yours,



Curtis W. Dowling

CWD/mgg
Enclosures

cc: J. Cameron Halford, Esquire (*via First Class Mail*)
Morgan S. Templeton, Esquire/Graham P. Powell, Esquire (*via First Class Mail*)
Michael B.T. Wilkes, Esquire/J. Derham Cole, Esquire (*via First Class Mail*)
Brett E. Dressler, Esquire (*via First Class Mail*)

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BARNES ALFORD STORK & JOHNSON, LLP

ATTORNEYS AT LAW

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TO

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
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