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August 4, 2014

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Via Email and US Mail

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1025 Third Avenue
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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

Dear Counsel:

I am in receipt of the Record on Appeal that you served by mail on July 21, 2014. Please be advised that there are many errors and deficiencies that will need to be corrected immediately so that the Respondents may be able to meet the deadline for the filing of the Final Briefs.

First and foremost, the Record on Appeal as prepared by Appellants' counsel does not include numerous documents, filings and other materials that have been designated by the other parties. Remarkably, the Record on Appeal does not even include all of the materials that were even designated by the Appellants. The missing documents are too numerous for me to list in this letter.

Second, the Record on Appeal includes a number of materials that do not appear to have been designated by any of the parties, including the Bankruptcy Order, the Complaint in Civil Action 2012-CP-22-934, and the Motion to Amend Answers in Civil Action 2012-CP-22-934. I would also add that I fail to recognize how documents from Civil Action 2012-CP-22-934 may even be included in the Record on Appeal because it is not the case on appeal.

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John M. Leiter, Esquire
K. Douglas Thornton, Esquire
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Third, the Record on Appeal that I received did not include the names, addresses and phone numbers of counsel on the cover, as required by Rule 267(a), SCACR.

Fourth, the Record on Appeal that I received was not bound as required by Rule 267(d), SCACR.

Fifth, the Record on Appeal that I received had no covers as required by Rule 267(e), SCACR.

Sixth, the Record on Appeal that I received was not "reproduced on both sides of the paper" as required by Rule 267(c), SCACR.

Seventh, the Record on Appeal that I received did not include a Certificate of Counsel as required by Rule 210(g), SCACR. There was no certification by counsel that "the Record on Appeal contains all material proposed to be included by any of the parties and not any other material." As addressed above, the Record on Appeal that I received did not include all material proposed by the parties and not any other material.

Please advise immediately whether you intend to voluntarily correct these many deficiencies in the Record on Appeal. If not, I will proceed with a Motion to Dismiss this appeal for the Appellants' failure to comply with the Appellant Court Rules.

Sincerely,

DAVIDSON & LINDEMANN, P.A.



Andrew F. Lindemann

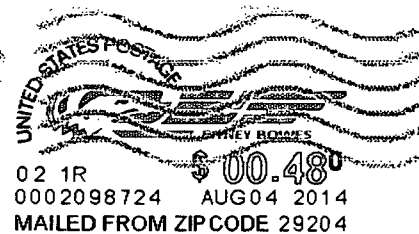
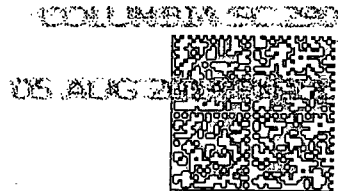
AFL/

cc: The Honorable Jenny Abbott Kitchings *(via US Mail only)*
Charles T. Smith, Esquire *(via Email only)*
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