

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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

Case No. 2009-CP-22-1045

73182

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.

\_\_\_\_\_  
MOTION TO CORRECT RECORD ON APPEAL  
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AUG 11 2014

**SC Court of Appeals**

The Respondent City of Georgetown respectfully moves this Court for an Order requiring the Appellants to file and serve a corrected Record on Appeal or a supplemental Record on Appeal that includes all of the documents designed for inclusion by the City. Specifically, the Record on Appeal as prepared and served by the Appellants on August 6, 2014, fails to include the transcript of the June 6, 2013 motion hearing which was clearly designated for inclusion in the Record on Appeal by the City.

The Respondent City of Georgetown is unable to prepare and file its Final Brief because its brief includes two citations to the omitted transcript. As a result, the City requests that the Court hold all deadlines in abeyance until this remaining issue regarding the Record on Appeal is resolved.

DAVIDSON & LINDEMANN, P.A.

BY: 

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(803) 806-8222

*Counsel for Respondent  
City of Georgetown*

Columbia, South Carolina

August 11, 2014

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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.

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**CERTIFICATE OF SERVICE**

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The undersigned employee of Davidson & Lindemann, P.A., attorneys for the Respondent City of Georgetown, does hereby certify that service of the **Motion to Correct 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 11th day of August 2014:

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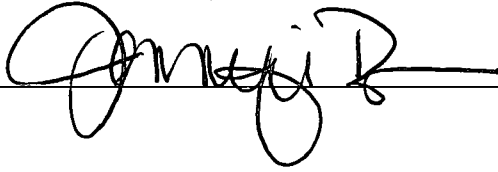
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DAVIDSON & LINDEMANN, P.A.

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August 11, 2014

Of Counsel  
Kenneth P. Woodington

Writer's Email: [alindemann@dml-law.com](mailto:alindemann@dml-law.com)

**Hand Delivered**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Edgar Brown Building  
1205 Pendleton Street  
Columbia, South Carolina 29201

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 Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Motion to Correct Record on Appeal** in the above referenced matter. Please file the original and return a clocked-in copy to me in the enclosed envelope. I have also enclosed my firm's \$25.00 check for the filing fee.

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  
August 11, 2014  
Page Two

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

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