

East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC < a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Mangement, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; and Bay Club Homes, LLC, Third Party Plaintiffs

v.

Robert Wasson and Barbara Wasson, individually and d/b/a Wasson Electric Heating & Air; and Charleston Chimney Services, Inc., Third Party Defendants.

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**NOTICE OF APPEARANCE OF PETER D. PROTOPAPAS  
FOR APPELLANT STEVEN GOLDBERG**

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TO: THE CLERK OF COURT AND ALL PARTIES OF RECORD

PLEASE TAKE NOTICE that Peter D. Protopapas of the law firm of Rikard & Protopapas LLC, at the address noted below, hereby enters his appearance as additional counsel on behalf of the Appellant, Steven Goldberg, along with Keith McCarty, Esq., Michael S. Seekings, Esq., and John C. Hayes, IV, Esq.

Please have the Court records reflect that the undersigned is now additional attorney of record for the above-referenced Appellant, and that all notices, schedules, orders and correspondence from the Court regarding this matter should be copied to the undersigned.

  
Peter D. Protopapas  
**RIKARD & PROTOPAPAS, LLC**  
1329 Blanding Street  
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*Attorneys for Appellant Goldberg*

**RECEIVED**  
AUG 21 2014

**SC Court of Appeals**

August 21, 2014

13303

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AUG 21 2014

SC Court of Appeals

THE SOUTH CAROLINA COURT OF APPEALS

Appellate Case No. 2012-213351

The Honorable Roger M. Young, Sr.  
Charleston County

Trial Court Case No. 2010-CP-10-09672

Hayden Jeffords, individually, and on behalf of all others similarly situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, Leslie Anne O'Neal, Trivette C. Hatcher, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown, Plaintiffs

Of whom Titus Gudel, Harold S. McEwan, William Scanlon, Delia Scanlon, Steven Goldberg, Brent McClaine, McKenzie Hutaff, Lynn Harris, and Kenneth A. Brown are the Secondary Appellants, and

Of whom Jonn Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher are the Respondents,

v.

East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC< a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC: Alexandra Road Investors, LLC; Creekstone Mangement, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; East Coast Carpentry a/k/a ECC Contracting, LLC: Fuller Drywall & Paint, Ltd.; Delta Mechanical, Inc. a/k/a Carolina Delta Mechanical; Wasson Electric Heating & Air; Bay Club Homes, LLC; Terracon Consultants, Inc.; and Salvador Rubalcaba d/b/a Rubalcala Construction, Defendants

Of whom East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC< a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC: Alexandra Road Investors, LLC; Creekstone Mangement, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn and Kevin Ball are the Appellants.

v.

East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC < a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Mangement, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; and Bay Club Homes, LLC, Third Party Plaintiffs

v.

Robert Wasson and Barbara Wasson, individually and d/b/a Wasson Electric Heating & Air; and Charleston Chimney Services, Inc., Third Party Defendants.

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**PROOF OF SERVICE**

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I, Jo-Elaine Boyd, of Rikard & Protopapas, do hereby certify that a copy of

*Notice of Appearance of Peter D. Protopapas on behalf of Appellant, Steven Goldberg*

has been served on all counsel by U.S. Mail on August 21, 2014 addressed as follows:

Justin Lucey, Esq.  
Joshua F. Evans, Esq.  
415 Mill Street  
Mount Pleasant, SC 29465

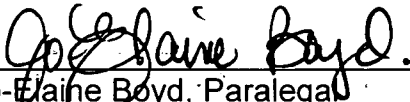
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RIKARD & PROTOPAPAS, LLC

  
Jo-Elaine Boyd, Paralegal

**THE SOUTH CAROLINA COURT OF APPEALS**

Appellate Case No. 2012-213351

The Honorable Roger M. Young, Sr.  
Charleston County

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Trial Court Case No. 2010-CP-10-09672

Hayden Jeffords, individually, and on behalf of all others similarly situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, Leslie Anne O'Neal, Trivette C. Hatcher, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown, Plaintiffs

Of whom Titus Gudel, Harold S. McEwan, William Scanlon, Delia Scanlon, Steven Goldberg, Brent McClaine, McKenzie Hutaff, Lynn Harris, and Kenneth A. Brown are the Secondary Appellants, and

Of whom Jonn Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher are the Respondents,

v.

East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC< a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC: Alexandra Road Investors, LLC; Creekstone Mangement, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; East Coast Carpentry a/k/a ECC Contracting, LLC; Fuller Drywall & Paint, Ltd.; Delta Mechanical, Inc. a/k/a Carolina Delta Mechanical; Wasson Electric Heating & Air; Bay Club Homes, LLC; Terracon Consultants, Inc.; and Salvador Rubalcaba d/b/a Rubalcala Construction, Defendants

Of whom East Bridge Town Lofts, LLC, a/k/a East Bridge, LLC< a/k/a East Ridge Homes, LLC, a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC: Alexandra Road Investors, LLC; Creekstone Mangement, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn and Kevin Ball are the Appellants.

v.



**Rikard & Protopapas, LLC**

Attorneys and Counselors at Law

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August 21, 2014

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

Re: Hayden Jeffords, et al. v. East Bridge Town Lofts, et al.  
Circuit Court Case No: 2010-CP-10-9672  
Appellate Case No: 2012-213351

Dear Ms. Kitchings:

Please find enclosed the original and seven (7) copies of *Appellant Steven Goldberg's Motion Pursuant To SCACR Rules 240 and 261 To Enforce Settlement Agreement Against Appellants Zohlens, O'Neill, Hatcher, Justin Lucey and Young Clement Rivers*; the original and two (2) copies of *Notice of Appearance of Peter D. Protopapas on behalf of Appellant Steven Goldberg*; and the original and two (2) copies of each *Proof of Service*.

I have enclosed my firm's check in the amount of \$25.00 representing the filing fee for the Motion. I would appreciate your returning clocked copies of each of the above to my courier.

Please do not hesitate to contact me if you have any questions, comments, or concerns.

Best regards,

  
Peter D. Protopapas

PDP/jb  
Encls.  
cc: to follow on page two

Justin Lucey, Esq.  
Edward D. Buckley, Jr., Esq.  
I Keith McCarty, Esq.  
Michael S. Seekings, Esq.  
John C. Hayes, IV, Esq.