

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

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
RETURN TO APPELLANTS'
MOTION TO SUPPLEMENT RECORD ON APPEAL**

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SC Court of Appeals

The Appellants have filed a Motion to Supplement the Record on Appeal to include the transcript of the June 6, 2013 motion hearing. The Respondent City of Georgetown consents to the Appellants' motion. In fact, the Respondent City has previously filed a Motion to Correct Record on Appeal which seeks this very same relief. That motion is still pending as well. The City clearly designated the transcript of the June 6, 2013 motion hearing for inclusion in the Record on Appeal. That transcript was not included in the Record on Appeal as prepared and served by the Appellants. The City submits that that transcript, which the City cites to in its Respondent's Brief, should properly be part of the Record on Appeal. The City therefore respectfully requests that the Court grant the Appellants' motion.

Respectfully submitted,

DAVIDSON & LINDEMANN, P.A.

BY: 

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*Counsel for Respondent
City of Georgetown*

Columbia, South Carolina

August 18, 2014

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The City of Georgetown, Hartford Casualty Insurance Company,
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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 **Respondent
City of Georgetown's Return to Appellants' Motion to Supplement 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 18th day of August 2014:

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August 18, 2014

Of Counsel
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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

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven copies of the **Respondent City of Georgetown's Return to Appellants' Motion to Supplement Record on Appeal** in the above referenced matter. Please file the original and return a clocked-in copy 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

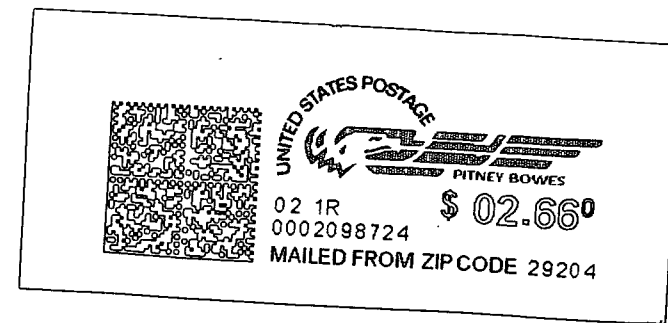
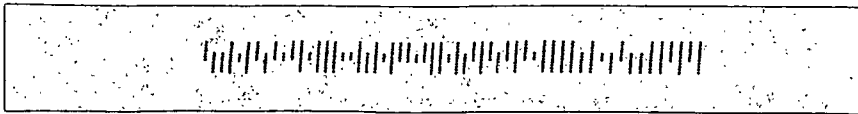
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The Honorable Jenny Abbott Kitchings
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Page Two

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*)
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Elise F. Crosby, Esquire (*w/ Enclosure*)



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