

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 William Scanlon, Delia Scanlon, Steven Goldberg, Brent McClaine, and Lynn Harris 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 Management, 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 Rubalcaba 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 Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson, Steve Keller; Edward Michael Washburn and Kevin Ball are the Appellants.

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SEP 15 2014

**SC Court of Appeals**

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 Management, 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 FLEET FREEMAN FOR INTERVENING  
RESPONDENT EAST BRIDGE LOFTS PROPERTY OWNERS ASSOCIATION, INC.  
a/k/a EAST BRIDGE TOWN LOFTS PROPERTY OWNERS ASSOCIATION, INC.

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LAW OFFICES OF FLEET FREEMAN, LLC  
Fleet Freeman, SC Bar No. 10435  
Susan Elizabeth Santilli, SC Bar No. 100407  
941 Houston Northcutt Boulevard, Suite 204  
Mt. Pleasant, SC 29464  
(843) 216-0009  
(843) 216-1914 Facsimile

Attorneys for East Bridge Lofts Property  
Owners Association, Inc. a/k/a East Bridge  
Town Lofts Property Owners Association, Inc.

TO: THE CLERK OF COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that Fleet Freeman, of the Law Offices of Fleet Freeman, LLC, enters his appearance on behalf of Intervening Respondent East Bridge Lofts Property Owners Association, Inc. a/k/a East Bridge Town Lofts Property Owners Association, Inc.

Intervening Respondent requests that the Court records show that Fleet Freeman is an additional attorney of record for the above-name Intervening Respondent and have all court notices, schedules, orders and correspondence directed to the undersigned.

LAW OFFICES OF FLEET FREEMAN, LLC  
Attorneys for East Bridge Lofts Property Owners  
Association, Inc. a/k/a East Bridge Town Lofts  
Property Owners Association, Inc.



Fleet Freeman, SC Bar No. 10435  
Susan Elizabeth Santilli, SC Bar No. 100407  
941 Houston Northcutt Boulevard, Suite 204  
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(843) 216-0009  
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[ffreeman@fflawfirm.com](mailto:ffreeman@fflawfirm.com)  
[beth@fflawfirm.com](mailto:beth@fflawfirm.com)

September 12, 2014

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

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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 Management, 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 Rubalcaba 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 Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson, Steve Keller; Edward Michael Washburn and Kevin Ball are the Appellants.

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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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CERTIFICATE OF SERVICE

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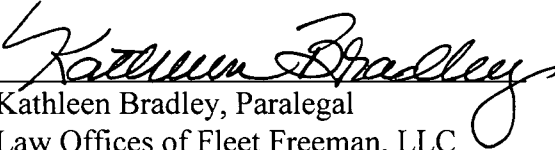
Kathleen Bradley, of the Law Offices of Fleet Freeman, LLC, certifies that the Motion to Intervene was served on the following by delivering same via United States Mail, first class postage prepaid, on September 12, 2014:

Peter D. Protopapas, Esquire  
Rikard & Protopapas, LLC  
P. O. Box 5640  
Columbia SC 29250

Justin Lucey, Esquire  
Joshua Fletcher Evans, Esquire  
415 Mill Street  
Mt. Pleasant, SC 29464

Edward D. Buckley, Jr., Esquire  
Russell G. Hines, Esquire  
Young Clement Rivers, LLP  
P. O. Box 993  
Charleston, SC 29402

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SEP 15 2014  
SC Court of Appeals



*Kathleen Bradley*

Kathleen Bradley, Paralegal  
Law Offices of Fleet Freeman, LLC  
941 Houston Northcutt Boulevard, Suite 204  
Mt. Pleasant, SC 29464

September 12, 2014

# LAW OFFICES OF FLEET FREEMAN, LLC

FLEET FREEMAN  
ffreeman@fflawfirm.com

BETH SANTILLI  
beth@fflawfirm.com

September 12, 2014

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P. O. Box 11629  
Columbia, SC 29211

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SEP 15 2014

**SC Court of Appeals**

Re: Jeffords, et al. v. East Bridge Town Lofts, LLC, et al.  
Appellate Case No. 2012-213351

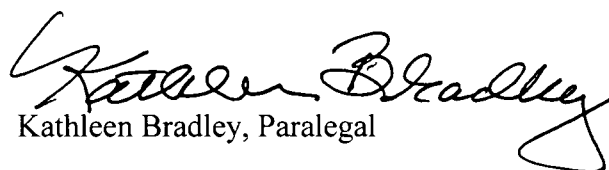
Dear Ms. Kitchings:

Enclosed please find originals and seven copies of a Motion to Intervene, Memorandum In Support of Motion to Intervene, Notice of Appearance and Certificate of Service, along with our check in the amount of \$25.00. Please file these documents and return clocked copies to this office in the envelope provided.

Attached to the Memorandum as Exhibit D is a Return to Steven Goldberg's Motion to Enforce Settlement. If the Court of Appeals grants the Motion to Intervene of East Bridge Lofts Property Owners Association, Inc. a/k/a East Bridge Town Lofts Property Owners Association, Inc., we will promptly supply another original with the proper number of copies for filing.

Thank you for your assistance in this matter.

Sincerely,

  
Kathleen Bradley, Paralegal

KB/p

Enclosures

cc: Peter D. Protopapas, Esquire  
Justin O. Lucey, Esquire  
Edward D. Buckley, Jr., Esquire

941 HOUSTON NORTHCUTT BLVD. • SUITE 204 • MOUNT PLEASANT, SOUTH CAROLINA 29464  
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