

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

M4107

Mikell R. Scarborough, Master-in-Equity

Appellate Case No. 2014-001273
Circuit Court Case No. 2012-CP-10-8447

Montclair Property Owners Association, Inc. and Montclair
Property Owners Association Board of Directors for and on
behalf of all owners of the Montclair Horizontal Property
Regime, as assignees of Montclair Associates Limited
Partnership, Cremco, LLC and Montclair Homes, LLC,

Respondents,

v.

Church Creek Construction, LLC,

Appellant.

**NOTICE OF APPEARANCE
OF STEPHEN L. BROWN AND RUSSELL G. HINES
ON BEHALF OF RESPONDENTS**

RECEIVED

NOV 10 2014

SC Court of Appeals

Stephen L. Brown and Russell G. Hines, of Young Clement Rivers, LLP, respectfully request that the Court, as well as counsel for Appellant, note their appearance as additional counsel of record in this matter—along with Joseph E. DaPore and Edward D. Buckley, Jr. (also of Young Clement Rivers, LLP)—for all Respondents.

To the extent that it would be more convenient for the Court or Appellant’s counsel to have a single point of contact for appellate correspondence with our firm, please direct all future correspondence regarding this appeal to the attention of Russell G. Hines. He will ensure that other counsel for Respondents are apprised of the same.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

Joseph E. DaPore (SC Bar No. 1544)

Edward D. Buckley, Jr. (SC Bar No. 994)

Russell G. Hines (SC Bar No. 71200)

25 Calhoun Street, Suite 400

Charleston, SC 29401

P.O. Box 993 (29402)

(843) 577-4000

Attorneys for Respondents

Charleston, South Carolina

Dated: 11/6/14

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

Appeal from Charleston County
Court of Common Pleas

Mikell R. Scarborough, Master-in-Equity

Appellate Case No. 2014-001273
Circuit Court Case No. 2012-CP-10-8447

Montclair Property Owners Association, Inc. and Montclair
Property Owners Association Board of Directors for and on
behalf of all owners of the Montclair Horizontal Property
Regime, as assignees of Montclair Associates Limited
Partnership, Cremco, LLC and Montclair Homes, LLC,

Respondents,

v.

Church Creek Construction, LLC,

Appellant.

PROOF OF SERVICE

RECEIVED

NOV 10 2014

SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, do hereby certify that a copy of the **Notice of Appearance of Stephen L. Brown and Russell G. Hines on Behalf of Respondents** was sent to all parties or their counsel via United States Mail, postage pre-paid, on November 6, 2014, addressed as follows:

C. Mitchell Brown, Esquire
Elizabeth Herlong Brogdon, Esquire
Miles E. Coleman, Esquire
Brian P. Crotty, Esquire
NELSON MULLINS RILEY & SCARBOROUGH, LLP
1320 Main Street, 17th Floor
Columbia, SC 29201


-and-

Thomas H. Hesse, Esquire
PRATT-THOMAS WALKER, PA
P.O. Drawer 22247
Charleston, SC 29413-2247

Attorneys for Appellant

Respectfully submitted,

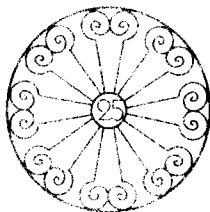
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines (SC Bar No. 71200)

Charleston, South Carolina

Dated: 11/6/14



YCR LAW
Young Clement Rivers, LLP

Aimee M. Justman
Legal Assistant

Direct Dial: (843) 720-5460
Direct Fax: (843) 579-1385
E-mail: Ajustman@ycrlaw.com

November 6, 2014

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

Re: Montclair Property Owners v. Church Creek Constr.
Appellate Case No.: 2014-001273
Case No.: 2012-CP-10-8447
YCR File: 13752-20081514

Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter, please find the original and one (1) copy of a **Notice of Appearance of Stephen L. Brown and Russell G. Hines on Behalf of Respondents**, the original and seven (7) copies of **Respondents' Motion for Extension of Time to File and Serve Initial Brief**, and the original and one (1) copy of a **Proof of Service** for each. Also enclosed is a check in the amount of \$25.00 to cover the costs associated with this request.

Kindly file the original and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Aimee M. Justman
Legal Assistant

RECEIVED

NOV 10 2014

SC Court of Appeals

/amj

Enclosures

cc: C. Mitchell Brown, Esquire, Nelson, Mullins, Riley & Scarborough, LLC
Elizabeth Herlong Brogdon, Esquire, Nelson, Mullins, Riley & Scarborough, LLC
Miles E. Coleman, Esquire, Nelson, Mullins, Riley & Scarborough, LLC
Brian P. Crotty, Esquire, Nelson, Mullins, Riley & Scarborough, LLC
Thomas H. Hesse, Esquire, Pratt-Thomas Walker, PA