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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

APR 22 2015

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

**SC Court of Appeals**

Clifton Newman, Circuit Court Judge

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Case No. 2010-CP-26-03901

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Rivergate Homeowners' Association, ..... Appellant,

v.

WW & LB Development Company, LLC, Speedy Concrete, AB Consulting Engineers, Inc., and Chuck's Construction Co., Inc., ..... Defendants.

Of Whom Speedy Concrete, AB Consulting Engineers, Inc., and Chuck's Construction Co., Inc are ..... Respondents.

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MOTION TO CONSOLIDATE

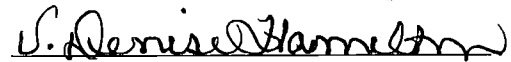
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Pursuant to Rule 240(a), SCACR, the undersigned attorney, Counsel for Appellant, Rivergate Homeowners' Association, files this motion respectfully asking the Court of Appeals to consolidate the following cases: *Rivergate Homeowners' v. WW & LB (Speedee Concrete, Inc.)*, Appellate Case No. 2015-000248, *Rivergate Homeowners' v. WW & LB (AB Consulting)*, Appellate Case No. 2015-000594, and *Rivergate v. WW & LB (Chuck's Construction, Inc.)*, Appellate Case No. 2015-000249.

Speedee Concrete, AB Consulting Engineers, Inc., and Chuck's Construction Co., Inc. are Defendants/Respondents in the above-captioned action. Additionally, the transcript, which we received on April 14, 2015, is the same for the three cases.

Moreover, the cases share the same and/or similar issues on appeal. Finally, Stephanie Burton, attorney for AB Consulting Engineers, primarily argued the Motion for Summary Judgment.

Dated: April 21, 2015



Stacy L. Stanley  
Bar No. 13410  
V. Denise Hamilton  
Bar No. 8851  
STANLEY LAW FIRM  
3303 Highway 9 East  
Little River, SC 29566  
(843) 390-9111 – Tel.  
(843) 390-9187 – Fax  
Attorney for Appellant

Other Counsel of Record:

G. Michael Smith, Esquire  
THOMPSON & HENRY, P.A.  
Post Office Box 1740  
Conway, SC 29528  
1300 Second Avenue, Third Floor  
**Attorney for Speedee Concrete, Inc**

Stephanie Burton, Esquire  
GIBBES BURTON, LLC  
308 East Saint John Street  
Spartanburg, South Carolina 29302  
**Attorney for AB Consulting Engineers**

Christina Bisset, Esquire  
McANGUS GOUDELOCK & COURIE LLC  
Post Office Box 1349  
Myrtle Beach, SC 29578  
1107 48<sup>th</sup> Avenue North, Suite 210  
**Attorney for Chuck's Construction, Inc. (Co-Counsel)**

J. Christopher Clark, Esquire  
McANGUS GOUDELOCK & COURIE LLC  
Post Office Box 1349  
Myrtle Beach, SC 29578  
**Attorney for Chuck's Construction, Inc. (Co-Counsel)**

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Of Whom Speedy Concrete, AB Consulting Engineers, Inc., and Chuck's Construction Co., Inc. are ..... Respondents.

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PROOF OF SERVICE

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I certify that I have served the Motion to Consolidate on the following Respondents, Speedy Concrete, AB Consulting Engineers, Inc., and Chuck's Construction Co., Inc., by depositing a copy of it in the United States Mail, postage prepaid, on April 21, 2015, addressed to their attorneys of record as follows:

G. Michael Smith, Esquire  
THOMPSON & HENRY, P.A.  
Post Office Box 1740  
Conway, SC 29528  
1300 Second Avenue, Third Floor  
**Attorney for Speedee Concrete, Inc**

Stephanie Burton, Esquire  
GIBBES BURTON, LLC  
308 East Saint John Street  
Spartanburg, South Carolina 29302  
**Attorney for AB Consulting Engineers**

Christina Bisset, Esquire  
McANGUS GOUDELOCK & COURIE LLC  
Post Office Box 1349  
Myrtle Beach, SC 29578  
1107 48<sup>th</sup> Avenue North, Suite 210  
**Attorney for Chuck's Construction, Inc. (Co-Counsel)**

J. Christopher Clark, Esquire  
McANGUS GOUDELOCK & COURIE LLC  
Post Office Box 1349  
Myrtle Beach, SC 29578  
**Attorney for Chuck's Construction, Inc. (Co-Counsel)**

Dated: April 21, 2015



Stacy L. Stanley  
Bar No. 13410  
V. Denise Hamilton  
Bar No. 8851  
STANLEY LAW FIRM  
3303 Highway 9 East  
Little River, SC 29566  
(843) 390-9111 – Tel.  
(843) 390-9187 – Fax  
Attorneys for Appellant



3303 HIGHWAY 9 EAST • LITTLE RIVER, SC 29566-7825  
PHONE: 843-390-9111 LITIGATION FAX: 843-390-9187 REAL ESTATE FAX: 843-390-9188

April 21, 2015

**VIA UPS Overnight**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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APR 22 2015

**SC Court of Appeals**

Re: *Rivergate Homeowners' v. WW & LB (Speedee Concrete, Inc.)*  
Appellate Case No. 2015-000248

*Rivergate Homeowners' v. WW & LB (AB Consulting)*  
Appellate Case No. 2015-000594

*Rivergate Homeowners' v. WW & LB (Chuck's Construction, Inc.)*  
Appellate Case No. 2015-000249

Dear Ms. Kitchings:

Regarding the above-referenced cases, please find enclosed an original and seven copies each of Appellant's Motion to Consolidate and Proof of Service on the Respondents, along with our check for \$25.00 for the filing fee. Please file this Motion and Proof of Service and return the clocked additional copy to me in the enclosed self-addressed, stamped envelope.

By copy of this letter, I am serving the same upon opposing counsel. Thank you for your time and attention. I look forward to hearing from you soon.

Sincerely,

A handwritten signature in cursive script that reads 'V. Denise Hamilton'.

Stacy L. Stanley  
Bar No. 13410  
V. Denise Hamilton  
Bar No. 8851  
STANLEY LAW FIRM  
3303 Highway 9 East  
Little River, SC 29566  
(843) 390-9111 – Tel.  
(843) 390-9187 – Fax  
Attorney for Appellant

Enclosure  
SLS/vdh

cc: Stephanie Burton, Esquire  
GIBBES BURTON, LLC  
308 East Saint John Street  
Spartanburg, South Carolina 29302  
**Attorney for AB Consulting Engineers**

G. Michael Smith, Esquire  
THOMPSON & HENRY, P.A.  
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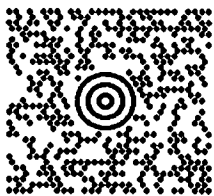
TAMMY  
843-390-9111  
STANLEY LAW FIRM  
3303 EAST HIGHWAY 9  
LITTLE RIVER SC 29566

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1 OF 1

**SHIP TO:**

CLERK, SC COURT OF APPEALS  
803-734-1890  
HONORABLE JENNY ABBOTT KITCHINGS  
1015 SUMTER STREET  
**COLUMBIA SC 29201-3726**

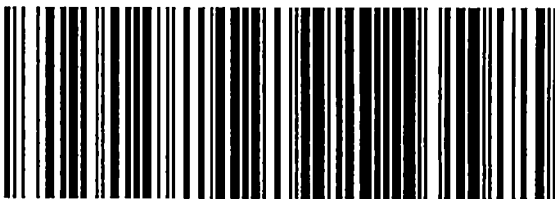


**SC 292 9-01**



**UPS NEXT DAY AIR SAVER 1P**

TRACKING #: 1Z 15A 37F 13 9160 6760



BILLING: P/P

Reference#1: Lit 08-0327

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