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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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APR 22 2015

APPEAL FROM HORRY COUNTY
Court of Common Pleas

SC Court of Appeals

Clifton Newman, Circuit Court Judge

Case No. 2010-CP-26-03901

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.

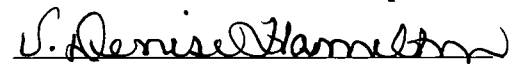
MOTION TO CONSOLIDATE

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



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V. Denise Hamilton
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Other Counsel of Record:

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1300 Second Avenue, Third Floor
Attorney for Speedee Concrete, Inc

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Case No. 2010-CP-26-03901

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

PROOF OF SERVICE

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
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Attorney for Chuck's Construction, Inc. (Co-Counsel)

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Attorney for Chuck's Construction, Inc. (Co-Counsel)

Dated: April 21, 2015



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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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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".

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Attorney for Appellant

Enclosure
SLS/vdh

cc: Stephanie Burton, Esquire
GIBBES BURTON, LLC
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