

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Circuit Court Judge

Case No. 2014-002766

RECEIVED

MAY 01 2015

SC Court of Appeals

Shipwatch Condominium Association,
Inc.,.....Appellant,

v.

Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC, Robert G. Sisroy,
individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; GlassTec, Inc.;
Spectech, Inc.; Sonneborn, Inc.; Chimney Sweeps, Inc.; Low Country Chimneys, Inc.;
EFCO Corp; W.C. Johnston Architectural Sales, Inc.; Charleston Glass Company, Inc.;
First Exteriors, LLC; Acrocrete, Inc.; BASF Corp; Gary Freeman Architect, Inc.; Gary
Freeman, individually;.....Defendants,

Of Which Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC, Robert G.
Sisroy, individually; Terrence J. McKelvey; Glasgow Roofing, Inc.; GlassTec, Inc.;
Spectech, Inc.; Sonneborn, Inc.; Chimney Sweeps, Inc.; Low Country Chimneys, Inc.;
EFCO Corp; W.C. Johnston Architectural Sales, Inc.; Charleston Glass Company, Inc.;
First Exteriors, LLC; Acrocrete, Inc.; BASF Corp; Gary Freeman Architect, Inc.; Gary
Freeman, individually; are Respondents

RESPONDENT FIRST EXTERIORS, LLC'S DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

Jonathan J. Anderson
Danielle B. Wegener
ANDERSON REYNOLDS
& STEPHENS, LLC
37 1/2 Broad Street
P O Box 87
Charleston, SC 29402
843-723-0185

AND

Jamés H. Elliott, Jr.
RICHARDSON PLOWDEN
& ROBINSON, PA
40 Calhoun Street
Charleston, SC 29401
843-805-6550

*Attorneys for Respondent
First Exteriors, LLC*

April 29, 2015

Respondent First Exteriors, LLC proposes that the following be included in the Record on Appeal:

1. Summons and Complaint
2. Carolina Concrete Systems, Inc.'s Motion for Summary Judgment
3. Carolina Concrete Systems, Inc.'s Memorandum in Support of Motion for Summary Judgment and attached exhibits
4. Plaintiff's Memorandum in Opposition to Carolina Concrete's Motion for Summary Judgment and attached exhibits
5. Transcript of Summary Judgment Hearing
6. Order granting Carolina Concrete partial summary judgment
7. Plaintiff's Motion for Reconsideration
8. Plaintiff's Supplemental Response to Carolina Concrete's Motion for Summary Judgment and Memorandum in Support of Motion for Reconsideration and attached exhibits
9. Order denying Plaintiff's Motion for Reconsideration
10. Notice of Appeal
11. Amended Notice of Appeal

Counsel certifies that this designation contains no matter which is irrelevant to this appeal

Signature appears on following page

Respectfully Submitted,



Jonathan J. Anderson
Danielle B. Wegener
ANDERSON REYNOLDS
& STEPHENS, LLC
37 ½ Broad Street
P O Box 87
Charleston, SC 29402
843-723-0185

AND

James H. Elliott, Jr.
RICHARDSON PLOWDEN
& ROBINSON, PA
40 Calhoun Street
Charleston, SC 29401
843-805-6550

*Attorneys for Respondent
First Exteriors, LLC*

April 29, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED
MAY 01 2015
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

R. Markley Dennis, Circuit Court Judge

Case No. 2014-002766

Shipwatch Condominium Association, Inc.,.....Appellant,

v.

Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC, Robert G. Sisroy,
individually; Terrence J. McKelvey; Glasgow Roofing, Inc., GlassTec, Inc.;
Spectech, Inc.; Sonneborn, Inc.; Chimney Sweeps, Inc.; Low Country Chimneys, Inc.,
EFCO Corp; W.C Johnston Architectural Sales, Inc.; Charleston Glass Company, Inc.;
First Exteriors, LLC; Acrocrete, Inc ; BASF Corp; Gary Freeman Architect, Inc.;
Gary Freeman, individually;Defendants,

Of Which Carolina Concrete Systems, Inc.; Sisroy Engineering, LLC, Robert G. Sisroy,
individually; Terrence J. McKelvey; Glasgow Roofing, Inc., GlassTec, Inc.,
Spectech, Inc ; Sonneborn, Inc., Chimney Sweeps, Inc.; Low Country Chimneys, Inc.;
EFCO Corp; W.C Johnston Architectural Sales, Inc.; Charleston Glass Company, Inc.;
First Exteriors, LLC, Acrocrete, Inc., BASF Corp; Gary Freeman Architect, Inc.,
Gary Freeman, individually; are Respondents

PROOF OF SERVICE

I certify that I have served Respondent First Exteriors, LLC's Initial Brief and
Designation of Matter to be Included in the Record on Appeal by depositing a copy in the

U. S. mail, postage paid on April 29, 2015 and via electronic mail addressed to counsel of record as set forth below:

R. Patrick Flynn, Esquire
Robertson Hollingsworth & Flynn
177 Meeting Street, suite 300
Charleston, SC 29401
Attorney for Plaintiff/Appellant

David S. Cobb, Esquire
Turner Padgett Graham & Laney, PA
P O Box 22129
Charleston, SC 29413
*Attorney for Defendant/Respondent
Carolina Concrete Systems, Inc*

R. Britton Kelly, Esquire
Rosen Rosen & Hagood, LLC
P O Box 893
Charleston, SC 29402
*Attorney for Defendant/Respondent W C
Johnston Architectural Sales, Inc*

Erin D Dean, Esquire
Stacey P. Canaday, Esquire
Tupper Grimsley & Dean, PA
P O Box 2055
Beaufort, SC 29901
*Attorneys for Defendant/Respondent
GlassTec, Inc*

L. Gregory Horton, Esquire
Adriane Belton, Esquire
Womble Carlyle Sandridge & Rice,
PLLC
P O Box 999
Charleston, SC 29402
*Attorneys for Defendant/Respondent
Acrocrete, Inc*

R. Britton Kelly, Esquire
Rosen Rosen & Hagood
P O Box 893

Samia H. Nettles, Esquire
Richardson Plowden
40 Calhoun Street, Suite 220
Charleston, SC 39401

And
L. Dean Best, Esquire
Best Honeycutt, PA
P O Box 13466
Charleston, SC 29422
*Attorneys for Defendant/Respondent
Glasgow Roofing, Inc*

Paul E Sperry, Esquire
Tyler P. Winton, Esquire
Carlock Copeland & Stair, LLP
40 Calhoun Street, Suite 400
Charleston, SC 29401
*Attorneys for Defendant/Respondent Sisnroy
Engineering, LLC and Robert Sisnroy*

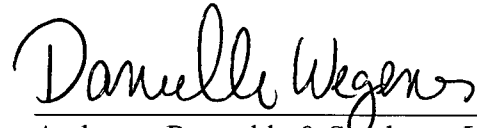
Amanda R. Maybank, Esquire
Marshall A Earhart, Esquire
Maybank Law Firm, LLC
P O Box 12579
Charleston, SC 29422
*Attorneys for Defendant/Respondent
Charleston Glass Company*

David A. Root, Esquire
Kernodle Root & Coleman
P O Box 13897
Charleston, SC 29422
*Attorney for Defendant/Respondent BASF
Corp*

Michael Barfield, Esquire
Barnwell Whaley Patterson & Helms, LLC
P O Drawer H

Charleston, SC 29402
*Attorneys for Defendant/Respondent
EFCO Corp, Inc*

Charleston, SC 29402
*Attorneys for Defendant/Respondent Gary
Freeman*

A handwritten signature in cursive script that reads "Danielle Wegens". The signature is written in black ink and is positioned above a horizontal line.

Anderson Reynolds & Stephens, LLC
P O Box 87
Charleston, SC 29402

ANDERSON REYNOLDS & STEPHENS, LLC

ATTORNEYS AT LAW
37 ½ BROAD STREET
POST OFFICE BOX 87
CHARLESTON, SOUTH CAROLINA 29402

JONATHAN J ANDERSON
LISA A REYNOLDS
SHANNA M STEPHENS
KATHERINE C MIARS
CURTIS B MARTIN
DANIELLE B WEGENER

TEL 843-723-0185
FAX 843-723-0977
email dwegener@arlawsc.com

April 29, 2015

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

RECEIVED

MAY 01 2015


SC Court of Appeals

Re: Shipwatch Condominium Association, Inc. v Carolina Concrete Systems, Inc ,
Sisroy Engineering, LLC, Robert G Sisroy, individually, Terrence J
McKelvey, Glasgow Roofing, Inc , GlassTec, Inc., Spectech, inc , Sonneborn,
Inc , Chimney Sweeps, Inc , Low Country Chimneys, Inc , EFCP Corp, W C
Johnston Architectural Sales, Inc , Charleston Glass company, Inc , First
Exteriors, LLC, Acrocrete, Inc , BASF Corp, Gary Freeman Architect, Inc ,
Gary Freeman, individually
Case Number 2012-CP-10-3857
Claim No 72-39-288720 (PEG)
ARS No. 20120 38
Appellate Case No.: 2014-002766

Dear Ms Kitchings.

Please find enclosed, the original and one (1) copy of Respondent First Exteriors, LLC's Initial Brief, Designation of Matter to be included in the Record on Appeal and the Proof of Service to all counsel Upon filing, please return one (1) clocked copy of the Initial Brief, Designation of Matter and Proof of Service to me in the self-addressed, postage page envelope enclosed

Your assistance in this matter is greatly appreciated With kindest regards, I am

Sincerely yours,

Danielle B Wegener

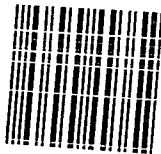
DBW/jcd

Enclosures

cc All Counsel of Record
(via electronic mail & U S mail)



1024

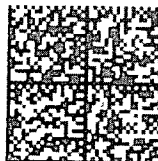


29211

U.S. POSTAGE
PAID
CHARLESTON, SC
29401
APR 29, 15
AMOUNT

\$0.20
00094495-16

TM



UNITED STATES POSTAGE
PITNEY BOWES
021P
0004667524 APR 29 2015
MAILED FROM ZIP CODE 29401



040708/EP-14 SEPTEMBER 2008
© 2008 USPS

This packaging is the property of the U.S. Postal Service® and is provided solely for use in sending Priority Mail® shipments. Misuse may be a violation of Federal law. This packaging is not for resale.



USPS TRACKING #



9114 9999 4423 8739 9923 11

Label 400 Jan 2013
7690-16-000-7948

RECEIVED

MAY 01 2015

SC Court of Appeals

RECEIVED

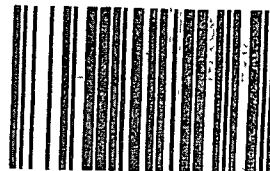
MAY 01 2015

SC Court of Appeals

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

& STEPHENS, LLC
Street
Box 87
29402

Country of Destination: /Pays de destination:

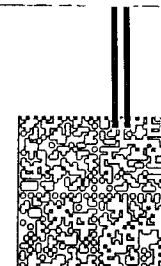



EP-14

Dupont™ Tyvek®
Protect What's Inside.™

NO POSTAGE STAMP NECESSARY
POSTAGE HAS BEEN PREPAID BY

ANDERSON REYNOLDS & STEPHENS LLC
ATTORNEYS AT LAW
PO BOX 87
CHARLESTON SC 29402-0087



UNITED STATES POSTAGE

PITNEY BOWES
02 1P \$ 003.50
0004667524
MAILED FROM ZIP CODE 29401

JCD

