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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Clifton Newman, Circuit Court Judge

RECEIVED
MAY 12 2015
SC Court of Appeals

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 AB Consulting Engineers, Inc. is Respondent.

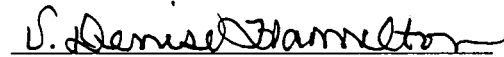
MOTION TO CONSOLIDATE

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: May 11, 2015



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

Other Counsel of Record:

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



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Inc., and Chuck's Construction Co., Inc., Defendants.

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PROOF OF SERVICE

I certify that I have served the Motion to Consolidate on the following Respondent, AB Consulting Engineers, by depositing a copy of it in the United States Mail, postage prepaid, on May 11, 2015, addressed to its attorney of record as follows:

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

Dated: May 11, 2015

V. Denise Hamilton

Stacy L. Stanley

Bar No. 13410

V. Denise Hamilton

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May 11, 2015

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VIA U.S. Mail

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

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

Dear Ms. Kitchings:

Regarding the above-referenced case, please find enclosed an original and seven copies each of Appellant's Motion to Consolidate and Proof of Service on the Respondent, 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 black ink that reads 'V. Denise Hamilton'.

Stacy L. Stanley
Bar No. 13410
V. Denise Hamilton
Bar No. 8851
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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