

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2010-CP-26-03901

75942  
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MAY 12 2015  
SC Court of Appeals

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 Chuck's Construction Co., Inc is ..... Respondent.

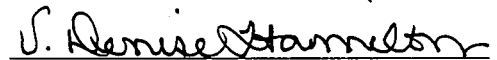
MOTION TO CONSOLIDATE

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  
Little River, SC 29566  
(843) 390-9111 – Tel.  
(843) 390-9187 – Fax  
Attorney for Appellant

Other Counsel of Record:

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

Of Whom Chuck's Construction Co., Inc. is ..... Respondent.

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PROOF OF SERVICE

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I certify that I have served the Motion to Consolidate on the following Respondent, Chuck's Construction Co., Inc., by depositing a copy of it in the United States Mail, postage prepaid, on May 11, 2015, addressed to its attorneys of record as follows:

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: May 11, 2015

*V. Denise Hamilton*

Stacy L. Stanley

Bar No. 13410

V. Denise Hamilton

Bar No. 8851

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Attorneys for Appellant

①



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May 11, 2015

**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 (Chuck's Construction, Inc.)*  
Appellate Case No. 2015-000249

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,

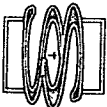
A handwritten signature in black ink that reads 'V. Denise Hamilton'.

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

Enclosure  
SLS/vdh

cc: 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)**

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STANLEY  
LAW FIRM

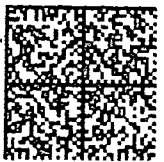
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