

77055

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

APPEAL FROM GEORGETOWN COUNTY  
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2013-001644

**RECEIVED**  
AUG 27 2015  
SC Court of Appeals

John Steven Goodwin, et. al., ..... Appellants,

v.

Landquest Development, LLC, et. al. .... Respondent.

***PETITION FOR REHEARING***

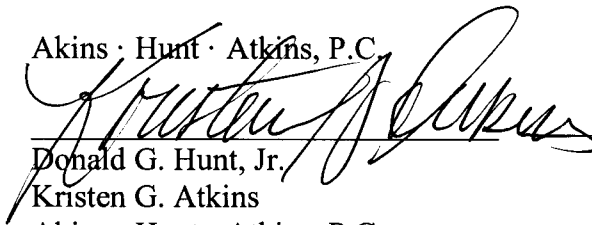
Donald G. Hunt, Jr.  
Kristen G. Atkins  
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*Pro Hac Vice* Counsel for Respondents Landquest  
Development, LLC, Kyle V. Corkum and South Bay  
Properties, LLC

NOW COME Respondents, Landquest Development, LLC, Kyle V. Corkum and South Bay Properties, LLC, and, pursuant to Rule 221 of the South Carolina Appellate Court Rules, respectfully petition for rehearing the appeal in this matter. In support of this petition, respondents, for purposes of judicial economy and to avoid repetition, adopt and incorporate the substance of the petition for rehearing filed by their fellow respondents Ronald L. Charlton, Bonnie N. Charlton, James R. Charlton, and Bayside Property, Inc.

Respectfully submitted,

Akins · Hunt · Atkins, P.C.



Donald G. Hunt, Jr.

Kristen G. Atkins

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*Pro Hac Vice* Counsel for Respondents Landquest Development, LLC, Kyle V. Corkum and South Bay Properties, LLC

26 August 2015

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\_\_\_\_\_ **PROOF OF SERVICE** \_\_\_\_\_

I, Kristen G. Atkins, the undersigned *pro hac vice* attorney for the Respondents Landquest Development, LLC, Kyle V. Corkum and South Bay Properties, LLC, do hereby certify that I have served upon the Appellants in the above referenced matter, by forwarding a copy of the same, via email and/or first class mail postage prepaid, unless otherwise stated below, to the following counsel listed below:

Documents:  
**PETITION FOR REHEARING**

Counsel:

Elise Freeman Crosby, Esquire  
405 Dozier Street  
Georgetown, SC 29440

Joseph Qualey, Esquire  
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Charleston, SC 29401

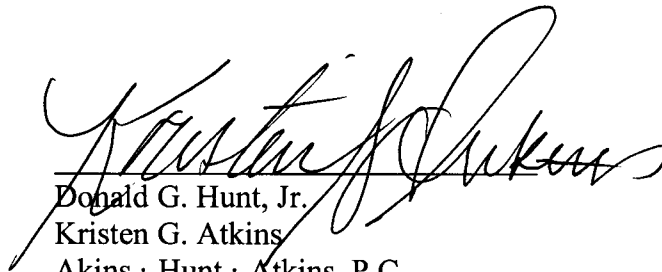
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*Pro Hac Vice* Counsel for Respondents Landquest  
Development, LLC, Kyle V. Corkum and South Bay  
Properties, LLC

26 August 2015



26 August 2015

VIA FED EX OVERNIGHT DELIVERY

South Carolina Court of Appeals  
Clerk of Court  
1220 Senate Street  
Columbia, SC 29201


**Re: *Goodwin, et al. v. Landquest Development, LLC, et al.***  
***Appellate Case No. 2013-001644***

Dear Clerk:

Please find enclosed the original and one copy Respondents' Landquest Development, LLC, Kyle V. Corkum and South Bay Properties, LLC's Petition for Rehearing and filing fee. Please file and return a file stamped copy to us in the self-addressed stamped envelope. If you need anything else, please let me know. With every good wish, I remain

Sincerely,

AKINS / HUNT / ATKINS, P.C.

  
Kristen G. Atkins  
Attorney at Law

**RECEIVED**

AUG 27 2015

SC Court of Appeals

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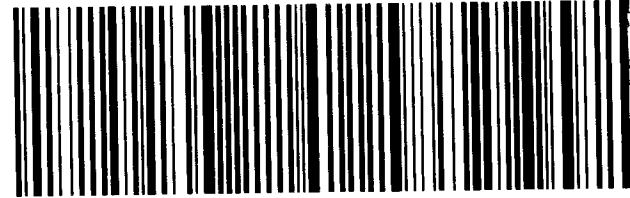
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 FedEx 2Day Second business day.\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
 FedEx Express Saver Third business day.\* Saturday Delivery NOT available.  
\* To most locations.

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 FedEx 2Day Freight Second business day.\*\* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.  
 FedEx 3Day Freight Third business day.\*\* Saturday Delivery NOT available.  
\* Call for details. \*\* To most locations.

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