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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

RECEIVED
DEC 21 2015
SC Court of Appeals

R. Markley Dennis, Jr., Circuit Court Judge

Case No. 2013-CP-10-5559
Appellate Case No. 2015-000201

Madison at Hamlin Plantation
Townhome Association, Inc.,
and Sandy Randall and Cherie
Berotti, individually and on
behalf of all others similarly
situated,

Respondents,

v.

Builders Support Services of
the Carolinas, Inc.
individually and f/k/a John
Wieland Homes and
Neighborhoods of the
Carolinas, Inc. individually
and f/k/a John Wieland Home
and Neighborhoods of NC,
Inc. individually and f/k/a
John Wieland Homes and
Neighborhoods of SC, Inc.,
John Wieland Homes of SC,
Inc., John Wieland Homes,
Inc., John Wieland Homes of
Charleston, Inc., AAA
Plumbing; American
Residential Services, LLC;
Builders Firstsource-Southeast
Group, LLC; Carolina Custom
Security, Inc.; Creative Touch
Interiors, Inc., individually
and f/k/a Rice Planters

Defendants,

Carpets, Inc.; Fogel Services,
Inc.; Larry's Termite Control,
Inc.; McClellan Plumbing,
LLC; Neighborhood
Management Associates, Inc.;
George Ryan Butler; Paul
Spencer; and John Doe 1-50

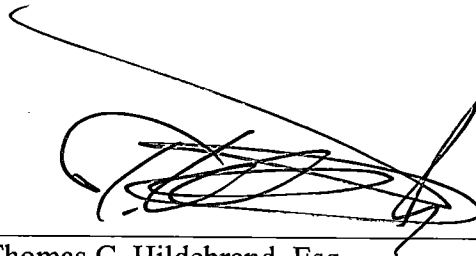
Of which Builders Support Services of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of NC, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc.; John Wieland Homes of SC, Inc.; John Wieland Homes, Inc.; John Wieland Homes of Charleston, Inc. are the Appellants.

**MOTION FOR SUBSTITUTION OF COUNSEL FOR BUILDERS
SUPPORT SERVICES OF THE CAROLINAS, INC., INDIVIDUALLY
AND F/K/A JOHN WIELAND HOMES AND NEIGHBORHOODS OF
THE CAROLINAS, INC., INDIVIDUALLY AND F/K/A JOHN WIELAND
HOMES AND NEIGHBORHOODS OF NC, INC., INDIVIDUALLY AND
F/K/A JOHN WIELAND HOMES AND NEIGHBORHOODS OF SC, INC.;**
**JOHN WIELAND HOMES OF SC, INC.; JOHN WIELAND HOMES,
INC.; JOHN WIELAND HOMES OF CHARLESTON, INC.**

Thomas C. Hildebrand, Jr.
Kristina Y. Baxley
F. Elliotte Quinn IV
Parker, Poe, Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
(843) 727-2650
Attorneys for Appellants

The undersigned counsel for the Appellants Builders Support Services of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of NC, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc.; John Wieland Homes of SC, Inc.; John Wieland Homes, Inc.; John Wieland Homes of Charleston, Inc. ("Appellants") hereby respectfully move this Court for an Order substituting Andrew Haselden, Esq. and the law firm Howser, Newman & Besley, LLC, as counsel of record in the above-referenced action, in the stead of Thomas C. Hildebrand, Esq., Kristina Y. Baxley, Esq., F. Elliott Quinn IV, Esq., and the law firm Parker Poe Adams & Bernstein LLP.

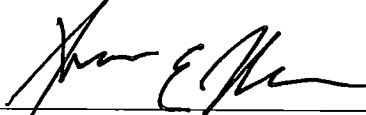
Appellants are in agreement with the requested substitution, and both current and proposed substituted counsel consent.



Thomas C. Hildebrand, Esq.
Kristina Y. Baxley, Esq.
F. Elliott Quinn, IV, Esq.
PARKER POE ADAMS & BERNSTEIN, LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
Phone: (843) 727-2650

Attorneys for Appellants Builders Support Services of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of NC, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc.; John Wieland Homes of SC, Inc.; John Wieland Homes, Inc.; John Wieland Homes of Charleston, Inc.

WITH CONSENT:



Andrew Haselden, Esq.
Howser, Newman & Besley, LLC
215 East Bay Street, Suite 303
Charleston, SC 29401
Phone: (843) 216-6940

Substituted Attorney for Appellants Builders Support Services of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of NC, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc.; John Wieland Homes of SC, Inc.; John Wieland Homes, Inc.; John Wieland Homes of Charleston, Inc.

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John Wieland Homes of SC,
Inc., John Wieland Homes,
Inc., John Wieland Homes of
Charleston, Inc., AAA
Plumbing; American
Residential Services, LLC;
Builders Firstsource-Southeast
Group, LLC; Carolina Custom

Defendants,

Security, Inc.; Creative Touch Interiors, Inc., individually and f/k/a Rice Planters Carpets, Inc.; Fogel Services, Inc.; Larry's Termite Control, Inc.; McClellan Plumbing, LLC; Neighborhood Management Associates, Inc.; George Ryan Butler; Paul Spencer; and John Doe 1-50

Of which Builders Support Services of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of NC, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc.; John Wieland Homes of SC, Inc.; John Wieland Homes, Inc.; John Wieland Homes of Charleston, Inc. are the Appellants.

**ORDER FOR SUBSTITUTION OF COUNSEL FOR BUILDERS
SUPPORT SERVICES OF THE CAROLINAS, INC., INDIVIDUALLY
AND F/K/A JOHN WIELAND HOMES AND NEIGHBORHOODS OF
THE CAROLINAS, INC., INDIVIDUALLY AND F/K/A JOHN WIELAND
HOMES AND NEIGHBORHOODS OF NC, INC., INDIVIDUALLY AND
F/K/A JOHN WIELAND HOMES AND NEIGHBORHOODS OF SC, INC.;
JOHN WIELAND HOMES OF SC, INC.; JOHN WIELAND HOMES,
INC.; JOHN WIELAND HOMES OF CHARLESTON, INC.**

Thomas C. Hildebrand, Jr.
Kristina Y. Baxley
F. Elliotte Quinn IV
Parker, Poe, Adams & Bernstein LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
(843) 727-2650
Attorneys for Appellants

IT APPEARING TO THE COURT that the Appellants Builders Support Services of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of NC, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc.; John Wieland Homes of SC, Inc.; John Wieland Homes, Inc.; John Wieland Homes of Charleston, Inc. ("Appellants") wish to substitute Andrew Haselden, Esq. and the law firm Howser, Newman & Besley, LLC, as its counsel of record in the above-referenced action, in the stead of Thomas C. Hildebrand, Esq., Kristina Y. Baxley, Esq., F. Elliotte Quinn IV, Esq., and the law firm Parker Poe Adams & Bernstein LLP; and that the proposed substitution of counsel is appropriate in accordance with Rule 11(b), SCRCP;

NOW, THEREFORE, by and with the consent of Appellants and their current and substituted counsel;

IT IS HEREBY ORDERED that Andrew Haselden and the law firm Howser, Newman & Besley, LLC be, and hereby is, substituted as counsel of record for the Appellants in the stead of Thomas C. Hildebrand, Esq., Kristina Y. Baxley, Esq., F. Elliotte Quinn IV, Esq., and the law firm Parker Poe Adams & Bernstein LLP.

AND IT IS SO ORDERED.

The Honorable Chief Judge John C. Few
South Carolina Court of Appeals

Columbia, South Carolina
_____, 2015

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v.

Builders Support Services of
the Carolinas, Inc. individually
and f/k/a John Wieland
Homes and Neighborhoods of
the Carolinas, Inc. individually
and f/k/a John Wieland Home
and Neighborhoods of NC,
Inc. individually and f/k/a
John Wieland Homes and
Neighborhoods of SC, Inc.,
John Wieland Homes of SC,
Inc., John Wieland Homes,
Inc., John Wieland Homes of
Charleston, Inc., AAA
Plumbing; American
Residential Services, LLC;
Builders Firstsource-Southeast
Group, LLC; Carolina Custom
Security, Inc.; Creative Touch
Interiors, Inc., individually and
PPAB 3028949v1

Defendants.

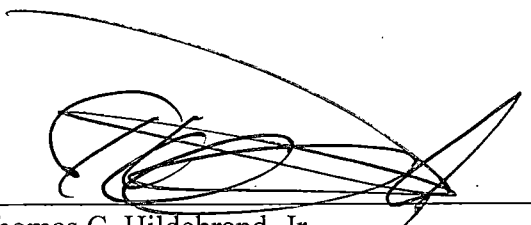
f/k/a Rice Planters Carpets,
Inc.; Fogel Services, Inc.;
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McClellan Plumbing, LLC;
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Of which Builders Support Services of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of NC, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc.; John Wieland Homes of SC, Inc.; John Wieland Homes, Inc.; and John Wieland Homes of Charleston, Inc. are the Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that on December 16, 2015, he served a copy of the Motion for Substitution of Counsel for Defendants Builders Support Services of the Carolinas, Inc. individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc. individually and f/k/a John Wieland Homes and neighborhoods of NC, Inc. individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc., John Wieland Homes of SC, Inc., John Wieland Homes, Inc., John Wieland Homes of Charleston, Inc., and Neighborhood Management Associates, Inc. on all counsel of record to this Appeal by United States Mail, postage prepaid, addressed as follows:

Justin O. Lucey, Esq.
Joshua F. Evans, Esq.
Justin O'Toole Lucey PA
P.O. Box 806
Mt. Pleasant, SC 29465



Thomas C. Hildebrand, Jr.
Kristina Y. Baxley
F. Elliotte Quinn IV
Parker Poe Adams & Bernstein, LLP
200 Meeting Street, Suite 301
Charleston, SC 29401
(843) 727-2653

Attorneys for the Appellants



Thomas C. Hildebrand, Jr.
Telephone: 843.727.2653
Direct Fax: 843.727.2680
tomhildebrand@parkerpoe.com

Charleston, SC
Charlotte, NC
Columbia, SC
Raleigh, NC
Spartanburg, SC

December 16, 2015

The Honorable Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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SC Court of Appeals

Re: Madison at Hamlin Plantation Townhome Association, Inc. and Sandy Randall and Cherie Berotti, individually, and on behalf of all others similarly situated v. Builders Support Services of the Carolinas, Inc., et al.
Appellate Case No.: 2015-000201

Dear Ms. Kitchings:

Enclosed herewith please find the original and six copies of the Motion for Substitution of Counsel for Builders Support Services of the Carolinas, Inc., individually and f/k/a John Wieland Homes and Neighborhoods of the Carolinas, Inc. individually and f/k/a John Wieland Homes and Neighborhoods of NC, Inc. individually and f/k/a John Wieland Homes and Neighborhoods of SC, Inc., John Wieland Homes of SC, Inc., John Wieland Homes, Inc., and John Wieland Homes of Charleston, Inc., along with a proposed Order for Substitution of Counsel in the above-referenced matter. I also enclose our firm's check in the amount of \$25.00 for the filing fee. Please file the original Motion and return a filed-stamped copy to me with the courier.

With best regards,

Yours very truly,

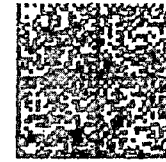
A handwritten signature in black ink, appearing to read 'Tom Hildebrand', written over a large, loopy scribble.

Thomas C. Hildebrand, Jr.

TCHJr/lah

cc: Justin O. Lucey, Esq. (via email, w/enclosures)
Joshua F. Evans, Esq. (via email, w/enclosures)

First Class Mail
Combustible



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Parker Poe

200 Meeting Street, Suite 301
Charleston, SC 29401
Post Office Box 160
Charleston, SC 29402

To:

The Honorable Jenny Abbott Kitchings
Clerk of Court, Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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