

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

) IN THE COURT OF COMMON PLEAS
) NINTH JUDICIAL CIRCUIT
) CIVIL ACTION NO.: 2013-CP-10-4450

LINDA A. GIBSON, Individually, and in capacity)
as TRUSTEE OF THE PAUL WILLIAM GIBSON)
FAMILY TRUST; HERITAGE SEVEN, LLC;)
SEVEN OAKS APARTMENTS, LLC; and 3205)
PALM BOULEVARD, LLC,)

Plaintiffs,)

vs.)

ANDREW K. EPTING, JR., LLC; ANDREW K.)
EPTING, JR., Individually; GEORGE J.)
KEFALOS, P.A.; GEORGE J. KEFALOS,)
Individually; GEDNEY M. HOWE, III, P.A.;)
GEDNEY M. HOWE, III, Individually; JOHN S.)
WEST, ATTORNEY-AT-LAW, LLC; and JOHN)
S. WEST, Individually,)

Defendants.)

ANSWER and AFFIRMATIVE
DEFENSES OF THE DEFENDANTS
TO SECOND AMENDED
COMPLAINT

(NON-JURY TRIAL DEMANDED)

TO: JAMES R. DAVIS ESQUIRE, ATTORNEY FOR THE PLAINTIFFS

AND NOW COME the Defendants, ANDREW K. EPTING, JR., LLC, and ANDREW K. EPTING, JR., Individually (hereinafter collectively referred to as "Attorney Epting"), GEORGE J. KEFALOS, P.A., and GEORGE J. KEFALOS, Individually (hereinafter collectively referred to as "Attorney Kefalos"), GEDNEY M. HOWE, III, P.A., and GEDNEY M. HOWE, III, Individually (hereinafter collectively referred to as "Attorney Howe"), and JOHN S. WEST, ATTORNEY-AT-LAW, LLC, and JOHN S. WEST, Individually (hereinafter collectively referred to as "Attorney West") (hereinafter all Individual and Corporate Defendants are referred to as the "Defendants"), by and through their undersigned counsel, and file this

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ATTORNEYS AT LAW

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MAR 21 2016
SC Court of Appeals

JAMES R. DAVIS, ESQ.
ADMITTED: SC, MA
JONATHAN GOULD, ESQ. (NY)
DONNA SZCZYTKO (PARALEGAL)

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By US Mail

March 18, 2016

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

Re: Linda A. Gibson v. Andrew K. Epting
Appellate Case No. 2016-000432
Our File No.: 2016057

Dear Ms. Kitchings:

Please find enclosed a \$25.00 payment (check no. 2700) for Appellants' First Request for Extension of Time to File Initial Brief. As set forth thereon, the appellants' initial brief would be due on or before May 7, 2016.

Separately, please find enclosed also correspondence between our office and the court reporter relating to our transcript order (October 20, 2015 hearing), pursuant to Rule 207(a)(1), SCACR. Our office received the hearing transcript on December 30, 2015.

With kind regards, I am

Yours very truly,


James R. Davis

JRD/jrd

cc: M. Dawes Cooke, Jr., Esq., Barnwell Whaley Patterson & Helms, LLC
Thomas Pendarvis, Esq., Pendarvis Law Offices, P.C.
Desiree Allen, South Carolina Office of Court Administration
Jeremy Bowers, Esq., Barnwell Whaley Patterson & Helms, LLC