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June 30, 2017

Hon. Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RECEIVED

JUL 03 2017

SC Court of Appeals

Re: Patricia Damico, et al vs. Lennar Carolinas, LLC, et al vs. TJB Trucking/Leasing,  
LLC, et al  
Appellate Case No. 2016-2339

Dear Ms. Kitchings:

Please allow this correspondence to serve as the Notice of the Respondent, TJB Trucking/Leasing, LLC, to join in the arguments contained in the Initial Briefs submitted on behalf of the Respondents DVS, Inc.; South Carolina Exteriors, LLC; Guaranteed Framing, LLC; et al as though those arguments were raised and asserted on behalf of TJB Trucking/Leasing, LLC.

By copy of this correspondence to all counsel of record, I am advising them of this Notice to Join as evidenced by the enclosed Proof of Service.

Should you have any questions or concerns regarding this matter, please do not hesitate to contact me.

With kindest regards, I am

Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.



David S. Black

DSB/tt

Enclosure (Proof of Service)

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THE STATE OF SOUTH CAROLINA  
South Carolina Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas  
J.C. Nicholson, Jr. Circuit Court Judge

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Appellate Case No. 2016-2339  
Case No. 2014-CP-08-02424

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**RECEIVED**

JUL 03 2017

SC Court of Appeals

Patricia Damico and Lenna Lucas, Individually and on behalf of all others similarly situated, Joshua and Brettany Beutow, Edward and Sylvia Dengg, Jonathan and Theresa Douglass, Anthony and Stacey Ray, Danny and Ellen Davis Morrow, Czara and Chad England, Bryan and Cynthia Camara, and Matthew Collins,  
Respondents,

v.

Lennar Carolinas, LLC, Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super Concrete of SC, Inc., Southern Green, Inc., TJB Trucking/Leasing, LLC, Paragon Site Constructors, Inc., Civil Site Environmental and Rick Bryant, Individually,  
Defendants,

Of which Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super Concrete of SC, Inc., Southern Green, Inc., TJB Trucking/Leasing, LLC, and Civil Site Environmental are Respondents.

And

Lennar Carolinas, LLC, Appellant,

v.

The Earthworks Group, Inc., Volkmar Consulting Services, LLC, Geometries Consulting, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C. & A. Concrete, Inc., Knight's Concrete Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Costal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders Firstsource-Southeast Group, LLC, and Low Country Renovations and Siding LLP, Third-Party Defendants,

Of which Volkmar Consulting Services, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C. & A. Concrete, Inc., Knight's Concrete Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders Firstsource-Southeast Group, LLC, are also Respondents.

and

Decor Corporation, Fourth Party Plaintiff, v.

Baranov Flooring, LLC, DJ Construction Services, LLC, Creative Wood Floors, LLC, Geraldo Cunha, Ebenezer Flooring, LLC, Emmanuel Flooring and Siding, LLC, Eusi Flooring and Covering, LLC, Nicolas Flores, Alexander Martinez, Isidru Mejia, Juan Perez, Ernesto M. Perez, N&B Construction, LLC, Jose Dias Rodrigues, Livia Sousa, Jose Betio Pereira, Jose Paz Castro Hernandez, Divinio Aperecido Corgosinho, Ricardo Chiche, CEBS Construction, Bayshore Siding and Flooring, Sebastio Luiz de Araujo, and John Does 1-4, Fourth-Party Defendants

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## PROOF OF SERVICE

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The undersigned counsel hereby certifies that he has served the foregoing Respondent TBJ Trucking/Leasing, LLC's *Notice to Join* upon the below-listed counsel of record via email and by affixing same with proper postage and placing same with the United States Postal Service on the United States Postal Service on the 30<sup>th</sup> day of June, 2017 addressed to the following:

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The undersigned counsel further certifies that he has served the foregoing Respondent TBJ Trucking/Leasing, LLC's *Notice to Join* upon the below-listed counsel of record via email only, on the 30<sup>th</sup> day of June, 2016 addressed to the following:

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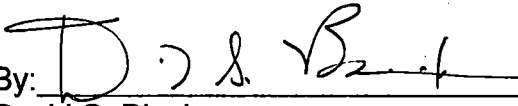
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June 30, 2017



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**TO:**

Case No. 2016-2339

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Post Office Box 11629  
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