

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

RECEIVED

JUL 21 2017

J.C. Nicholson, Jr., Circuit Court Judge

SC Court of Appeals

Case No. 2014-CP-08-2424
Appellate Court Case No. 2016-2339

Patricia Damico, and Lenna Lucas, individually and on behalf of all others
similarly situated, Joshua and Brittany Beutow, Edward and Sylvia Degg,
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., TBJ
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., Volkmark 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,
Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy,
Construction, LLC, Construction Applicators Charleston, LLC, LA New
Enterprises, LLC, Décor 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,
LLC..... 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, Décor 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

Décor Corporation..... Fourth-Party Plaintiff,

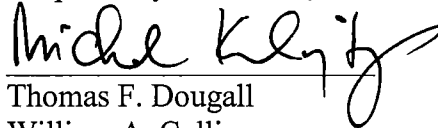
v.

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 Aparecido Corgosinho, Ricardo Chiche, CEBS Construction, Bayshore Siding and Flooring, Sebastio Luiz de Araujo, and John Does 1-4..... Fourth-Party Defendants.

RESPONDENTS OZZY CONSTRUCTION, LLC, BARANOV FLOORING, LLC, AND JUAN GARZA RAMOS'S NOTICE OF JOINDER IN FILINGS

Respondents, Ozzy Construction, Inc., Baranov Flooring, and Juan Garza Ramos, hereby join in the briefs and other filings filed by other Respondents in this appellate matter and adopt the arguments presented therein to the extent they are applicable to Ozzy Construction, Inc., Baranov Flooring, LLC, and Juan Garza Ramos.

Respectfully Submitted,



Thomas F. Dougall
William A. Collins

✓ Michal Kalwajtys
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1700 Woodcreek Farms Road, Suite 100
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Columbia, South Carolina

July 20, 2017

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AND

Décor Corporation..... Fourth-Party Plaintiff,

v.

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PROOF OF SERVICE

I certify that on July 20, 2017, I have served the Respondents Ozzy Construction, LLC, Baranov Flooring, LLC, and Juan Garza Ramos's Notice of Joinder in Filings by depositing a copy thereof in the United States mail, postage prepaid, on all counsel of record, addressed as follows:

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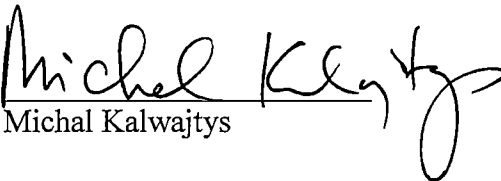
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Michal Kalwajtys

Columbia, SC
July 20, 2017

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CERTIFIED MEDIATOR IN SC

ADELAIDE DENNIS KLINE
OF COUNSEL

WILLIAM A. COLLINS, JR.

MICHAL KALWAJTYS

July 20, 2017

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

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Re: Patricia Damico, Lenna Lucas, individually and on behalf of all others similarly situated, Joshua and Brettany Buetow, 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 v. Lennar Carolinas, LLC, Spring Grove Plantation Development, Inc., et al. v. A.C. & A Concrete, Inc., et al.

Case No: 2014-CP-08-02424

Appellate Case No: 2016-2339

Dear Ms. Kitchings:

Please find enclosed the original and two copies of Respondents Ozzy Construction, LLC, Baranov Flooring, LLC, and Juan Garza Ramos's Notice of Joinder in briefs and other filings of other Respondents in the above matter.

Please call me at the number below if you should have any questions regarding this matter.

Sincerely,

DOUGALL & COLLINS


Michal Kalwajtys

Enc. (as stated)

cc: All counsel of record

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