

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J.C. Nicholson, Circuit Judge

RECEIVED

Appellate Case No. 2016-002339

SEP 21 2017

Circuit Court Case No. 2014-CP-08-2424

SC Court of Appeals

Patricia Damico and Lenna Lucas, Individually and on behalf of all others similarly situated, Joshua and Brittany Beutow, Edward and Sylvia Dengg, Jonathan and Teresa 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, Paragon Site Constructors, Inc., Civil Site Environmental are Respondents and Lennar Carolinas, LLC,.....**Appellant**

v.

The Earthworks Group, Inc., Volkmar Consulting Services, LLC, Geometrics 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, 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, Décor Corporation, DVS, INC., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders FirstSource -Southeast Group, LLC are.....**Respondents**

PROOF OF SEVICE

I hereby certify that I have this date served Respondent, Manale Landscaping, LLC,'s *Final Brief of Respondent Manale Landscaping, LLC* by depositing a copy of the same in the U.S. Mail, postage paid, addressed as set forth below:

John C. Hayes, IV, Esquire
Mary-Margaret F. Noland, Esquire
Hayes Law Firm, LLC
180 Meeting Street, Suite 330
Charleston, SC 20401

-and-
Michael J. Jordan, Esquire
Catherine K. Dunn, Esquire
The Steinberg Law Firm, LLP
P.O. Box 1028
Goose Creek, SC 29445
Attorneys for Plaintiff

Robert Trippett Boineau, III, Esquire
Heath McAlvin Stewart, III, Esquire
McAngus Goudelock Courie
PO Box 12519
Columbia, SC 29211
*Attorneys for Spring Grove Plantation
Development Inc.*

Stephen L. Brown, Esquire
Catherine H. Chase, Esquire
Young Clements Rivers, LLP
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
-and-
Preston Bruce Dawkins, Jr., Esquire
Aiken Bridges, P.A.
P.O. Drawer 1931
Florence, SC 29503
*Attorney for Alpha Omega Construction
Group, Inc.*

Stephen P. Hughes, Esquire
Andy Yoho, Esquire
Howell, Gibson and Hughes, P.A.
Post Office Box 40
Beaufort, SC 29901-0040
*Attorney for Builders FirstSource-
Southeast Group, LLC*

David S. Black, Esquire
Howell, Gibson and Hughes, PA
P.O. Box 40
Beaufort, SC 29901
TJB Trucking/Leasing, LLC

R. Patrick Flynn, Esquire
Michael E. Wright, Esquire
Robertson Hollingsworth & Flynn
Wells Fargo Center
550 King Street, Suite 300
Charleston, SC 29403
Attorneys for Super Concrete of SC, Inc.

David C. Cleveland, Esquire
Clawson & Staubes, LLC
126 Seven Farms drive, Suite 200
Charleston, South Carolina 29494-8144
Attorney for Low Country Renovations and Siding, LLP, Myers Landscaping

N. Keith Emge, Jr, Esquire
Kathy A. Carlsten, Esquire
Carlock Copeland
40 Calhoun Street, Suite 400
Charleston, SC 29401
Attorney for Civil Site Environmental, Inc.

Erin D. Dean, Esquire
Tupper, Grimsley & Dean, P.A.
Post Office Box 2055
Beaufort, South Carolina 29901-2055
Attorney for LA New Enterprises, LLC and Raul Martinez Masonry, LLC

Brent M. Boyd, Esq.
Murphy & Grantland, P.A.
4406-B Forest Drive (29260)
P.O. Box 6648
Columbia, SC 29260
Attorney for Coastal Concrete Southeast, LLC and Coastal Concrete Southeast II, LLC

Bachman S. Smith, IV, Esquire
Haynsworth Sinkler Boyd, PA
P.O. Box 340
Charleston, SC 29402-0340
Attorneys for Southern Green, Inc., Southern Green Consulting Services, LLC

Samia H. Nettles, Esquire
Richardson Plowden & Robinson PA
171 Church Street, Suite 150
Charleston, SC 29401
Attorneys for Décor Corporation

Emily R. Gifford, Esquire
Richardson Plowden & Robinson, PA
1900 Barnwell Street
P.O. Drawer 7788
Columbia, SC 29202
Attorney for Geometrics Consulting Services, LLC

Ronald G. Tate, Jr., Esquire
R. Batten Farrar, Esquire
Gallivan, White & Boyd, P.A.
P.O. Box 10589
Greenville, South Carolina 29603
Attorney for Volkmar Consulting Services, LLC

Jenny C. Honeycutt, Esquire
Best Honeycutt, PA
PO Box 13466
Charleston, SC 29422
Attorney for South Carolina Exteriors, LLC

Alan R. Belcher, Jr., Esquire
Derek Newberry, Esquire
Hall Booth Smith, P.C.
40 Calhoun Street, Suite 550
Charleston, SC 29401
-and-
Christine C. Varnado, Esquire
The Siebels Law Firm

John M. Grantland, Esquire
Rogers E. Harrell, III, Esquire
Murphy & Grantland, PA
4406-B Forest Drive (29260)
P.O. Box 6648
Columbia, SC 29260
Attorney for Isidro Mejia

Christopher Adams, Esquire
Collins & Lacy
PO Box 12487
Columbia, South Carolina 29211
Attorneys for Unique Framing, LLC

Shanna Milcetic Stephens, Esq.
Katherine C. Miars, Esq.
Anderson Reynolds & Stephens, LLC
PO Box 87
Charleston, South Carolina 29402
Attorneys for A.C.&A. Concrete, Inc.

Thomas F. Dougall, Esq.
William A. Collins, Jr., Esq.
Dougall & Collins
1700 Woodcreek Farms Road, Suite 100
Elgin, South Carolina 29045
Attorneys for Ozzy Construction, LLC

Michal Kalwajtys, Esquire
Dougall & Collins
1700 Woodcreek Farms Road, Suite 100
Elgin, SC 29045
Attorney for Baranov Flooring, LLC,
Juan Garza Ramos

38 Broad Street, Suite 200
Charleston, SC 29401
Attorney for Guaranteed Framing, LLC
S. Markey Stubbs, Esq.
Baker, Ravenel & Bender, LLP
3710 Landmark Drive, Suite 400
P.O. Box 8057
Columbia, South Carolina, 29202
Attorney for DVC, Inc.

Steven L. Smith
Zachary J. Closser
Samuel M. Wheeler
Smith Closser, P.A.
P.O. Box 405878
Charleston, SC 29423-0578
Attorneys for Knight's Concrete Products, Inc. and Knight's Redi-Mix, Inc. and Paragon Sitework Constructors, Inc.

John E. Rogers, II, Esquire
The Ward Law Finn, P.A.
P.O. Box 5663
Spartanburg, SC 29304
Attorney for Land/Site Services, Inc.

Jenna K. McGee, Esq.
Elliotte Quinn, Esq.
Parker Poe Adams & Bernstein, LLP
200 Meeting Street, Suite 301
Charleston, South Carolina 29401
-and-
James Lynn Werner, Esquire
Parker Poe Adams & Bernstein, LLP
1221 Main Street, Suite 1100
Columbia, SC 29201
Attorney for Lennar
Attorneys for Lennar Carolinas, LLC

Robert Batten Farrar, Esquire
Ronald G. Tate, Jr., Esquire
Gallivan White & Boyd, PA
P.O. Box 10589
Greenville, SC 29603
*Attorneys for Southern Green
Consulting Services, LLC*

Sarah L. Fragale, Esquire
Turner Padget Graham & Laney, PA
P.O. Box 22129
Charleston, SC 29413
Attorney for Espino Roofing, LLC

Tommy Boger, Esquire
Wall Templeton
PO Box 1200
Charleston, South Carolina 29402
Attorneys for First Construction, LLC

William W. Watkins, Jr., Esquire
Stephanie G. Brown, Esquire
Wall Templeton Haldrup, PA
145 King Street, Suite 300
Charleston, SC 29401
*Attorney for Italiaia Construction,
LLC, Lima Construction, LLC and
N&B Construction, LLC*

Edward & Sylvia Dengg
238 Maywood Drive
Moncks Corner, SC 29461
Pro Se

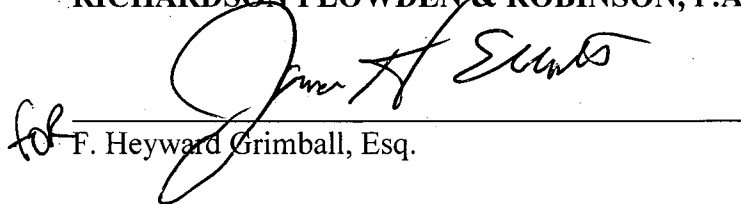
David S. Cobb, Esq.
Turner Padget Graham & Laney, PA
P.O. Box 22129
Charleston, SC 29413
-and-
Patrick J. McDonald, Esq.
Resnick & Louis, PC
234 Seven Farms Drive, Suite 128
Charleston, SC 29492
*Attorney for Construction Applicators
Charleston, LLC*

K. Michael Barfield, Esquire
D. Summers Clark, II, Esquire
Barnwell Whaley Patterson & Helms
P.O. Drawer H
Charleston, SC 29402
Attorney for The Earthworks Group, Inc.

Steven W. Ouzts, Esquire
Joshua D. Shaw, Esquire
Turner Padget Graham & Laney, P.A.
POB 1473
Columbia, SC 29202
Attorney for CEBS Construction

Anthony & Stacy Ray
107 Lock Circle
Hampton, VA 23669
Pro Se

RICHARDSON PLOWDEN & ROBINSON, P.A.


F. Heyward Grimball, Esq.

19
September 18, 2017
Charleston, South Carolina