

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

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

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

**RECEIVED**  
JUN 18 2018  
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 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. 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, 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, 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, Isidini Mejia, Juan Perez, N&B Construction, LLC, Jose Dias Rodrigues, Livia Sousa, 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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RESPONDENTS' MOTION FOR FIRST EXTENSION OF TIME TO FILE  
AND SERVE ITS RETURN TO APPELLANT LENNAR CAROLINA LLC'S  
PETITION TO REVIEW THE CIRCUIT COURT'S ORDER LIFTING  
AUTOMATIC STAY

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NOW COMES Respondents Patricia Damico, Joshua and Brettany Beutow, Bryan and Cynthia Camara, Matthew Collins, Jonathan and Theresa Douglass, Czara and Chad England, Lenna Lucas, and Danny and Ellen Davis Morrow, ("Respondents") by and through its undersigned counsel, and respectfully moves the Court pursuant to Rule 240 and Rule 263, SCACR for a seven (7) day extension of time to and including Friday, June 22, 2018, to file and serve its Return to Appellant Lennar Carolina, LLC's Petition to Review the Circuit Court's Order Lifting the Automatic Stay. The current deadline is Friday, June 15, 2018.

In support thereof Respondents shows the Court the following:

1. Respondents' time for filing their Return to Appellant Lennar Carolina, LLC's Petition to Review the Circuit Court's Order Lifting the Automatic Stay has not expired.

2. Counsel for Appellants consents to the requested extension as shown on the correspondence attached as Exhibit A.

3. This request is necessitated due to undersigned counsel's numerous other work conflicts and scheduling deadlines.

4. Respondents need additional time to prepare their Return to Appellant Lennar Carolina, LLC's Petition to Review the Circuit Court's Order Lifting the Automatic Stay.

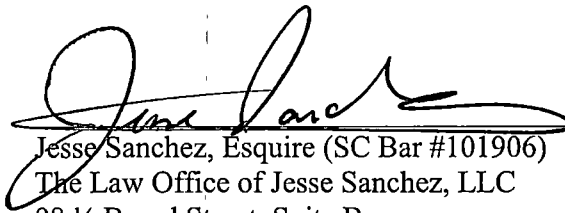
5. A seven (7) day extension of time for Respondents to file their Return to Appellant Lennar Carolina, LLC's Petition to Review the Circuit Court's Order Lifting the Automatic Stay will serve the interests of justice by allowing counsel adequate time to prepare a thorough and detailed Return.

6. Respondents do not request this extension for the impermissible purpose of delay.

WHEREFORE, the below-named Respondents respectfully move the Court for a seven (7) day extension of time to and including Friday, June 22, 2019, to file and serve Respondents' their Return to Appellant Lennar Carolina, LLC's Petition to Review the Circuit Court's Order Lifting the Automatic Stay. Respondents further request that the current deadline be held in abeyance while the Court considers this request.

[Signature on Following Page]

Respectfully submitted,



Jesse Sanchez, Esquire (SC Bar #101906)  
The Law Office of Jesse Sanchez, LLC  
98 ½ Broad Street, Suite B  
Charleston, SC 29401  
Phone: 843-814-8181  
Fax: 843-284-3953  
[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

John C. Hayes, IV, Esquire (SC Bar # 69740)  
Hayes Law Firm, LLC  
180 Meeting Street, Suite 330  
Charleston, SC 29401  
Phone: 843-805-7003  
Fax: 843-573-7388  
[jhayes@hayeslaw.org](mailto:jhayes@hayeslaw.org)

***ATTORNEYS FOR RESPONDENTS PATRICIA  
DAMICO, JOSHUA AND BRETTANY  
BEUTOW, BRYAN AND CYNTHIA CAMARA,  
MATTHEW COLLINS, JONATHAN AND  
TERESA DOUGLASS, CZARRA AND CHAD  
ENGLAND, LENNA LUCAS, AND DANNY AND  
ELLEN DAVIS MORROW***

June 14, 2018  
Charleston, South Carolina

# EXHIBIT A



Jesse Sanchez &lt;jesse@jessesanchezlaw.com&gt;

---

**FW: Damico, et al. v. Lennar Carolinas, LLC, et al. Appellate Case 20216-2339**

---

Renee Gainey <rgainey@hayeslaw.org>  
To: Jesse Sanchez <jesse@jessesanchezlaw.com>

Thu, Jun 14, 2018 at 10:31 AM

Mr. Werner has no objection.

*Renèe C. Gainey*

Paralegal to John C. Hayes, Nina E. Meola

HAYES LAW FIRM, LLC

180 Meeting St., Ste. 330

Charleston, SC 29401

Phone: 843-805-7003

Mobile: 843-819-4127

Fax: 843-573-7388

Email: [rgainey@hayeslaw.org](mailto:rgainey@hayeslaw.org)

---

**From:** Werner, James L. <jimwerner@parkerpoe.com>  
**Sent:** Thursday, June 14, 2018 10:31 AM  
**To:** Renee Gainey <rgainey@hayeslaw.org>  
**Subject:** RE: Damico, et al. v. Lennar Carolinas, LLC, et al. Appellate Case 20216-2339

We have no objection

---

**James Werner**  
Partner



Parker Poe

1221 Main Street | Suite 1100 | Columbia, SC 29201  
Office: 803.253.8913 | Fax: 803.255.8017 | [vcard](#) | [map](#)

Visit our website at  
[www.parkerpoe.com](http://www.parkerpoe.com)

---

**From:** Renee Gainey [mailto:rgainey@hayeslaw.org]  
**Sent:** Thursday, June 14, 2018 9:42 AM  
**To:** Werner, James L.  
**Subject:** Damico, et al. v. Lennar Carolinas, LLC, et al. Appellate Case 20216-2339

\*\*\*Caution: External email\*\*\*

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Re: Patricia Damico, et. al. v. Lennar Carolinas, LLC, et al.

Case No. 2014-CP-08-2424; Appellate Case No. 2016-23339.

Mr. Werner,

Good morning, I hope all is well. We would like to file a Motion for Extension of Time to File and Serve Respondents' Return in the above-referenced matter. Would you kindly consent to a 5-7 day extension? Thank you and please let me know if there's anything I can do.

*Renée C. Gainey*

Paralegal to John C. Hayes, Nina E. Meola

HAYES LAW FIRM, LLC

180 Meeting St., Ste. 330

Charleston, SC 29401

Phone: 843-805-7003

Mobile: 843-819-4127

Fax: 843-573-7388

Email: [rgainey@hayeslaw.org](mailto:rgainey@hayeslaw.org)

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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

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

Appellate Case No. 2016-2339  
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Patricia Damico and Lerna Lucas, Individually and on behalf of all others similarly situated, Joshua and Brittany 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.

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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.

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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, Isidini Mejia, Juan Perez, N&B Construction, LLC, Jose Dias Rodrigues, Livia Sousa, 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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I, the undersigned, certify that I have served *Respondents' Motion for First Extension of Time to File and Serve its Return to Appellant Lennar Carolina LLC's Petition to Review the Circuit Court's Order Lifting Automatic Stay* to the attorneys of record by depositing a copy of it in the United States Mail on June 14, 2018, addressed to the following:

James Lyn Werner  
Jenna K. McGee  
F. Elliotte Quinn IV  
Parker, Poe, Adams & Bernstein, LLP  
PO Box 1509  
Columbia, SC 29201  
*Attorneys for Appellant Lennar Carolinas, LLC*

Michael J. Jordan  
Catherine K. Dunn  
The Steinberg Law Firm, LLP  
PO Box 1028  
Goose Creek, SC 29445  
*Attorneys for Respondents Patricia Damico; Joshua and Brettany Beutow; Bryan and Cynthia Camara; Matthew Collins; Jonathan and Theresa*

*Douglass; Czara and Chad England;  
Lenna Lucas; Danny and Ellen Davis  
Morrow*

Laura H. Budd  
The Budd Law Group, PLLC  
10550 Independence Point Pkway, Suite  
301  
Matthews, NC 28105  
*Attorneys for Respondent Alpha Omega  
Construction Group, Inc.*

Stephen L. Brown  
Catherine H. Chase  
Young Clement Rivers, LLP  
PO Box 993  
Charleston, SC 29402  
*Attorneys for Respondent Alpha Omega  
Construction Group, Inc.*

Brent M. Boyd  
PO Box 6648 4406-B Forest Dr.  
Columbia, SC 29260  
*Attorney for Respondents Coastal  
Concrete Southeast, LLC and Coastal  
Concrete Southeast II, LLC*

Kathy A. Carleston  
N. Keith Emge (Chip)  
Carlock Copeland & Stair, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
*Attorney for Respondent Civil Site  
Environmental, Inc.*

Stephen P. Hughes  
Howell Gibson and Hughes, P.A.  
PO Box 40  
Beaufort, SC 29901  
*Attorney for Respondent Builders  
FirstSource-Southeast Group, LLC*

Preston B. Dawkins, Jr.  
Aiken Bridges, P.A.  
P.O. Drawer 1931

Florence, SC 29503  
*Attorneys for Respondent Alpha Omega  
Construction Group, Inc.*

David S. Cobb  
Turner Padgett  
PO Box 22129  
Charleston, SC 29413  
*Attorney for Respondent Construction  
Applicators Charleston, LLC*

Samia Nettles  
James H. Elliott, Jr.  
Richardson Plowden  
40 Calhoun Street, Suite 220  
Charleston, SC 29401  
*Attorney for Respondent Décor  
Corporation and Manale Landscaping,  
LLC*

S. Markey Stubbs  
Baker Ravenel Bender  
PO Box 8057  
Columbia, SC 29202  
*Attorney for Respondent DVS, Inc.*

Christine Companion Varnado  
The Seibels Law Firm  
38 Broad Street, Suite 200  
Charleston, SC 29401  
*Attorneys for Respondent Guaranteed  
Framing, LLC*

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

John E. Rogers, II  
The Ward Law Firm, p.A.

PO Box 5663  
Spartanburg, SC 29304  
*Attorney for Respondent Land/Site  
Services, Inc.*

Jenny C. Honeycutt  
PO Box 13466  
James Island, SC 29422  
*Attorney for Respondent South Carolina  
Exteriors, LLC*

R. Trippett Boineau, III  
Heath McAlvin Stewart, III  
McAngus, Goudelock & Courie, LLC  
PO BOX 12519  
Columbia, SC 29211  
*Attorneys for Respondent Spring Grove  
Plantation Development, Inc.*

Derek M. Newberry  
Hall Booth Smith, P.C.  
40 Calhoun Street, Suite 550  
Charleston, SC 29401  
*Attorneys for Respondent Guaranteed  
Framing, LLC*

Alan R. Belcher, Jr.  
40 Calhoun Street, Suite 550  
Charleston, SC 29401  
*Attorneys for Respondent Guaranteed  
Framing, LLC*

Erin D. Dean  
Tupper Grimsely & Dean, P.A.  
PO BOX 2055  
Beaufort, SC 29901-2055  
*Attorney for Respondents LA New  
Enterprises, LLC and Raul Martinez  
Masonry, LLC*

Thomas F. Dougall  
William A. Collins, Jr.  
Michael Kalwajtys  
Dougall & Collins  
1700 Woodcreek Farms Road, Suite 100  
Elgin, South Carolina 29045

*Attorney for Respondent Ozzy  
Construction, LLC*

Bachman S. Smith, IV  
Haynsworth Sinkler Boyd, P.A.  
134 Meeting Street, Third Floor  
Charleston, SC 29401  
*Attorney for Respondent Southern  
Green, Inc.*

R. Patrick Flynn  
Michael Allen  
Pope Flynn, LLC  
PO Box 70  
Charleston, SC 29402  
*Attorneys for Respondent Super  
Concrete of SC, Inc.*

David Shuler Black  
Howell Gibson & Hughes, P.A.  
PO Box 40  
Beaufort, SC 29901-0040  
*Attorney for Respondent TJB  
Trucking/Leasing, LLC*

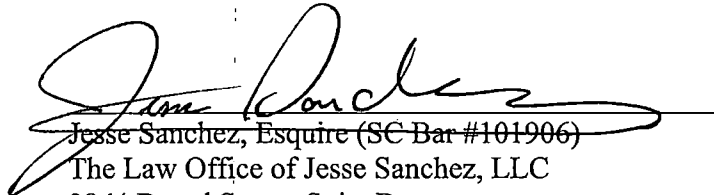
Edward and Sylvia Dengg  
238 Maywood Drive  
Moncks Corner, SC 29461  
*Pro Se Respondents*

Third Party Defendant Myers  
Landscaping, Inc.  
c/o Joseph H. Myers, Registered Agent  
Myers Landscaping, Inc.  
382 Big Bird Lane  
Summerville, SC 29486

Ronald G. Tate, Jr.  
R. Batten Farrar  
Gallivan, White & Boyd, P.A.  
PO Box 10589  
Greenville, SC 29603  
*Attorneys for Respondent Volkmar  
Consulting Services, LLC.*

Anthony and Stacey Ray  
107 Loch Circle  
Hampton, VA 23669  
*Pro Se Respondents*  
Shanna Milcetek Stephens  
Katherine C. Miars  
Anderson Reynolds & Stephens, LLC  
PO Box 87  
Charleston, SC 29402

*Attorney for Respondent A.C.&A  
Concrete, Inc.*



Jesse Sanchez, Esquire (SC Bar #101906)  
The Law Office of Jesse Sanchez, LLC  
98 ½ Broad Street, Suite B  
Charleston, SC 29401  
Phone: 843-814-8181  
Fax: 843-284-3953  
[jesse@jessesanchezlaw.com](mailto:jesse@jessesanchezlaw.com)

and

John C. Hayes, IV, Esquire (SC Bar # 69740)  
Hayes Law Firm, LLC  
180 Meeting Street, Suite 330  
Charleston, SC 29401  
Phone: 843-805-7003  
Fax: 843-573-7388  
[jhayes@hayeslaw.org](mailto:jhayes@hayeslaw.org)

***ATTORNEYS FOR RESPONDENTS PATRICIA  
DAMICO, JOSHUA AND BRETTANY  
BEUTOW, BRYAN AND CYNTHIA CAMARA,  
MATTHEW COLLINS, JONATHAN AND  
TERESA DOUGLASS, CZARRA AND CHAD  
ENGLAND, LENNA LUCAS, AND DANNY AND  
ELLEN DAVIS MORROW***

June 14, 2018  
Charleston, South Carolina



June 14, 2018

VIA USPS PRIORITY MAIL AND FAX (803) 734-1839

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29211

**RECEIVED**

JUN 18 2018

**SC Court of Appeals**

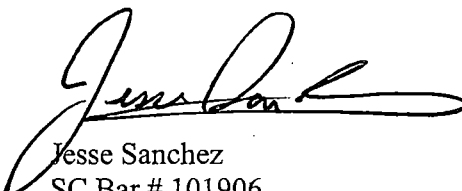
**Re: Patricia Damico, et. al. v. Lennar Carolinas, LLC, et al.  
Case No. 2014-CP-08-2424; Appellate Case No. 2016-2339.**

Dear Ms. Kitchings,

Enclosed herewith, please find one (1) original and six (6) copies of *Respondents' Motion For First Extension of Time to File and Serve its Return to Appellant Lennar Carolina LLC's Petition to Review the Circuit Court's Order Lifting Automatic Stay and Proof of Service*. Please also allow this letter to serve as a Notice of Appearance of Jesse Sanchez as attorney of record for the below-listed Respondents. A check for the \$25.00 the filing fee for this motion is enclosed.

Thank you for your assistance with this matter. Should you have any questions or wish to discuss the request, please do not hesitate to contact me directly.

Sincerely,

  
Jesse Sanchez  
SC Bar # 101906

And

John C. Hayes, IV, Esquire  
SC Bar # 69740  
Hayes Law Firm, LLC  
180 Meeting Street, Suite 330  
Charleston, SC 29401

**THE LAW OFFICE OF JESSE SANCHEZ, LLC**  
98½ Broad Street, Suite B, Charleston, SC 29401 P: 843.814.8181 F: 843.284.3953  
jesse@jessesanchezlaw.com jessesanchezlaw.com

✓

Phone: 843-805-7003  
Fax: 843-573-7388  
[jhayes@hayeslaw.org](mailto:jhayes@hayeslaw.org)

***ATTORNEYS FOR RESPONDENTS PATRICIA DAMICO, JOSHUA AND  
BRETTANY BEUTOW, BRYAN AND CYNTHIA CAMARA, MATTHEW COLLINS,  
JONATHAN AND TERESA DOUGLASS, CZARRA AND CHAD ENGLAND,  
LENNA LUCAS, AND DANNY AND ELLEN DAVIS MORROW***

Cc: All Counsel of Record (listed on following pages)

James Lyn Werner  
Jenna K. McGee  
F. Elliotte Quinn IV  
Parker, Poe, Adams & Bernstein, LLP  
PO Box 1509  
Columbia, SC 29201  
*Attorneys for Appellant Lennar Carolina, LLC*

Michael J. Jordan  
Catherine K. Dunn  
The Steinberg Law Firm, LLP  
PO Box 1028  
Goose Creek, SC 29445  
*Attorneys for Respondents Patricia Damico; Joshua and Brittany Beutow; Bryan and Cynthia Camara; Matthew Collins; Jonathan and Theresa Douglass; Czara and Chad England; Lenna Lucas; Danny and Ellen Davis Morrow*

Laura H. Budd  
The Budd Law Group, PLLC  
10550 Independence Point Pkway, Suite 301  
Matthews, NC 28105  
*Attorneys for Respondent Alpha Omega Construction Group, Inc.*

Stephen L. Brown  
Catherine H. Chase  
Young Clement Rivers, LLP  
PO Box 993  
Charleston, SC 29402  
*Attorneys for Respondent Alpha Omega Construction Group, Inc.*

Brent M. Boyd  
PO Box 6648 4406-B Forest Dr.  
Columbia, SC 29260  
*Attorney for Respondents Coastal Concrete Southeast, LLC and Coastal Concrete Southeast II, LLC*

Kathy A. Carleston  
N. Keith Emge (Chip)  
Carlock Copeland & Stair, LLP

40 Calhoun Street, Suite 400  
Charleston, SC 29401  
*Attorney for Respondent Civil Site Environmental, Inc.*

Stephen P. Hughes  
Howell Gibson and Hughes, P.A.  
PO Box 40  
Beaufort, SC 29901  
*Attorney for Respondent Builders FirstSource-Southeast Group, LLC*

Preston B. Dawkins, Jr.  
Aiken Bridges, P.A.  
P.O. Drawer 1931  
Florence, SC 29503  
*Attorneys for Respondent Alpha Omega Construction Group, Inc.*

David S. Cobb  
Turner Padgett  
PO Box 22129  
Charleston, SC 29413  
*Attorney for Respondent Construction Applicators Charleston, LLC*

Samia Nettles  
James H. Elliott, Jr.  
Richardson Plowden  
40 Calhoun Street, Suite 220  
Charleston, SC 29401  
*Attorney for Respondent Décor Corporation and Manale Landscaping, LLC*

S. Markey Stubbs  
Baker Ravenel Bender  
PO Box 8057  
Columbia, SC 29202  
*Attorney for Respondent DVS, Inc.*

Christine Companion Varnado  
The Seibels Law Firm  
38 Broad Street, Suite 200  
Charleston, SC 29401

*Attorneys for Respondent Guaranteed Framing, LLC*

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

John E. Rogers, II  
The Ward Law Firm, p.A.  
PO Box 5663  
Spartanburg, SC 29304  
*Attorney for Respondent Land/Site Services, Inc.*

Jenny C. Honeycutt  
PO Box 13466  
James Island, SC 29422  
*Attorney for Respondent South Carolina Exteriors, LLC*

R. Trippett Boineau, III  
Heath McAlvin Stewart, III  
McAngus, Goudelock & Courie, LLC  
PO BOX 12519  
Columbia, SC 29211  
*Attorneys for Respondent Spring Grove Plantation Development, Inc.*

Derek M. Newberry  
Hall Booth Smith, P.C.  
40 Calhoun Street, Suite 550  
Charleston, SC 29401  
*Attorneys for Respondent Guaranteed Framing, LLC*

Alan R. Belcher, Jr.  
40 Calhoun Street, Suite 550  
Charleston, SC 29401  
*Attorneys fro Respondent Guaranteed Framing, LLC*

Erin D. Dean  
Tupper Grimsely & Dean, P.A.  
PO BOX 2055  
Beaufort, SC 29901-2055  
*Attorney for Respondents LA New Enterprises, LLC and Raul Martinez Masonry, LLC*

Thomas F. Dougall  
William A. Collins, Jr.  
Michael Kalwajtys  
Dougall & Collins  
1700 Woodcreek Farms Road, Suite 100  
Elgin, South Carolina 29045  
*Attorney for Respondent Ozzy Construction, LLC*

Bachman S. Smith, IV  
Haynsworth Sinkler Boyd, P.A.  
134 Meeting Street, Third Floor  
Charleston, SC 29401  
*Attorney for Respondent Southern Green, Inc.*

R. Patrick Flynn  
Michael Allen  
Pope Flynn, LLC  
PO Box 70  
Charleston, SC 29402  
*Attorneys for Respondent Super Concrete of SC, Inc.*

David Shuler Black  
Howell Gibson & Hughes, P.A.  
PO Box 40  
Beaufort, SC 29901-0040  
*Attorney for Respondent TJB Trucking/Leasing, LLC*

Edward and Sylvia Dengg  
238 Maywood Drive  
Moncks Corner, SC 29461  
*Pro Se Respondents*

Third Party Defendant Myers Landscaping,  
Inc.

c/o Joseph H. Myers, Registered Agent  
Myers Landscaping, Inc.  
382 Big Bird Lane  
Summerville, SC 29486

Ronald G. Tate, Jr.

R. Batten Farrar  
Gallivan, White & Boyd, P.A.  
PO Box 10589  
Greenville, SC 29603  
*Attorneys for Respondent Volkmar  
Consulting Services, LLC.*

Anthony and Stacey Ray

107 Loch Circle  
Hampton, VA 23669  
*Pro Se Respondents*

Shanna Milcetek Stephens

Katherine C. Miars  
Anderson Reynolds & Stephens, LLC  
PO Box 87  
Charleston, SC 29402  
*Attorney for Respondent A.C.&A Concrete,  
Inc.*

U.S. POSTAGE  
PAID  
CHARLESTON, SC  
29403  
JUN 14, 18  
AMOUNT  
**\$0.00**  
R2303S100577-33



U.S. POSTAGE  
PAID  
CHARLESTON, SC  
29403  
JUN 14, 18  
AMOUNT  
**\$6.70**  
R2303S100577-33

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ORDER FREE SUPPLIES ONLINE

FROM: THE LAW OFFICE OF JESSE SANCHEZ LLC  
9812 BROAD STREET, SUITE B  
CHARLESTON, SC 29401

TO: THE HON. JENNY A. RICHMOND  
SC COURT OF APPEALS  
1220 SENATE STREET  
COLUMBIA, SC 29201

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