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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

Case No. 2014-CP-08-2424

RECEIVED  
MAR 07 2019  
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, Johnathan 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, 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,

---

**MOTION TO WITHDRAW  
MARY S. WILLIS AS COUNSEL FOR  
ALPHA OMEGA CONSTRUCTION GROUP, INC.**

---

YOUNG CLEMENT RIVERS, LLP  
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*Attorneys for the Respondent Alpha Omega  
Construction Group, Inc.*

COME NOW Stephen L. Brown, Catherine H. Chase, and Preston B. Dawkins, all as counsel for the Respondent, Alpha Omega Construction Group, Inc. (hereinafter “Alpha Omega”) and respectfully request that this Court withdraw Mary S. Willis as counsel on behalf of Alpha Omega in the above-captioned matter, pursuant to Rule 264(b), SCACR. Previously, and while employed at the firm of Young Clement Rivers, LLP, Mary S. Willis appeared on behalf of Respondent Alpha Omega. Ms. Willis has since left the firm. Upon withdrawal as counsel, Alpha Omega shall continue to be represented by Stephen L. Brown and Catherine H. Chase of Young Clement Rivers, LLP and Preston B. Dawkins of Aiken, Bridges, Elliott, Tyler & Saleeby, P.A. It is the desire of Mary S. Willis to be withdrawn as counsel, and Alpha Omega has consented to the withdrawal as indicated on the attached **Exhibit A**. For the foregoing reasons, the undersigned request that this Court enter an order withdrawing her appearance in this matter.

<SIGNATURE PAGE FOLLOWS>

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*Attorneys for the Respondent Alpha Omega  
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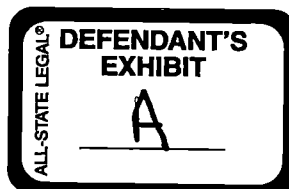
Charleston, South Carolina

Dated: March 5, 2019

Alpha Omega Construction Group, Inc. consents to Mary S. Willis withdrawing as counsel of record in the matter of Patricia Damico and Lenna Lucas, individually and on behalf of all others similarly situated, et al. v. Lennar Carolinas, LLC, et al. v. Lennar Carolinas, LLC v. Alpha Omega Construction Group, Inc., et al., Appellate Case No. 2016-002339, Civil Action No.: 2014-CP-08-2424, as Stephen L. Brown and Catherine H. Chase of Young Clement Rivers, LLP will remain counsel of record for Alpha Omega Construction Group, Inc.

  
Chris Stafford  
Alpha Omega Construction Group, Inc.

Date: 2/08/2019



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

Case No. 2014-CP-08-2424

Patricia Damico, and Lenna Lucas, Individually and on behalf of all others similarly situated, Joshua and Brettany Beutow, Edward and Sylvia Dengg, Johnathan 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, 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

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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 SERVICE**

---

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*Attorneys for the Respondent Alpha Omega  
Construction Group, Inc.*

I, Catherine H. Chase, of Young Clement Rivers, LLP, counsel for Alpha Omega Construction Group, Inc., do hereby certify that I have served **MOTION TO WITHDRAW MARY S. WILLIS AS COUNSEL FOR ALPHA OMEGA CONSTRUCTION GROUP, INC.** on all other parties by emailing and/or depositing a copy of the same in the United States Mail, postage prepaid, on March 5, 2019, addressed as follows to their counsel:

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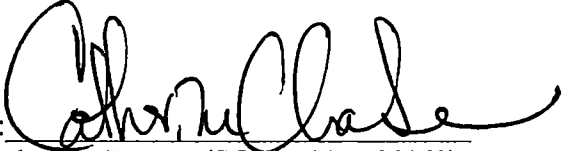
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**Pro Se Respondent**

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Hampton, VA 23669  
**Pro Se Respondents**

YOUNG CLEMENT RIVERS LLP

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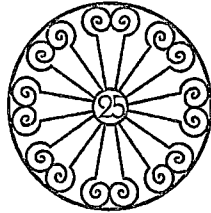
AND

AIKEN, BRIDGES, ELLIOT, TYLER &  
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*Attorneys for the Respondent Alpha Omega  
Construction Group, Inc.*

Charleston, South Carolina

Dated: March 5, 2019



# YCR LAW

Catherine H. Chase

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March 5, 2019

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Patricia Damico, et al. v. Lennar Carolinas, LLC, et al. v. Lennar Carolinas, LLC  
v. Alpha Omega Construction Group, Inc., et al.  
Appellate Case No. 2016-002339  
Case No.: 2014-CP-08-2424  
Claim No.: CPP1027537  
YCR File: 10857-20160042

**RECEIVED**

MAR 07 2019

SC Court of Appeals

Dear Ms. Kitchings:

Enclosed herewith for filing in the above-referenced matter please find the original and seven (7) copies of Motion to Withdraw Mary S. Willis as Counsel for Alpha Omega Construction Group, Inc., along with the original and one (1) copy of a Proof of Service and this firm's check in the amount of \$50.00 for filing fees. Please file the originals and return one file-stamped copy to me in the envelope provide.

By copy of this letter with the enclosures, I am providing all counsel of record and pro se parties with a copy of this motion.

As always, thank you for your assistance. If you have any questions, please do not hesitate to contact me. With kindest regards, I am.

With kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP

Catherine H. Chase

CHC/ahs  
Enclosures

CC: All Counsel of Record, with enclosures (via Email and USPS mail)  
All pro se parties, with enclosures (via USPS mail)

Hasler

FIRST-CLASS MAIL

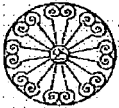
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US POSTAGE \$002.50<sup>0</sup>



ZIP 29401  
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**FIRST CLASS MAIL**



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