

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

Joseph M. Strickland, Master-in-Equity Judge

Appellate Case No. 2018-001156

RECEIVED

FEB 19 2019

SC Court of Appeals

Quality Lawn Care and Landscaping, Inc. d/b/a Design South Landscape Co.....Appellant,

v.

Coogler Construction Company, Inc.,.....Respondent.

RECORD ON APPEAL

VOLUME III

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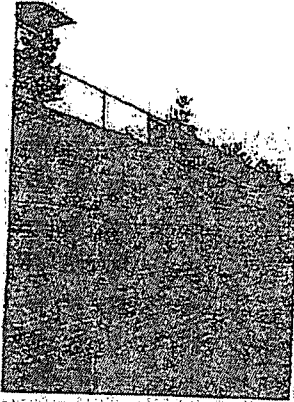
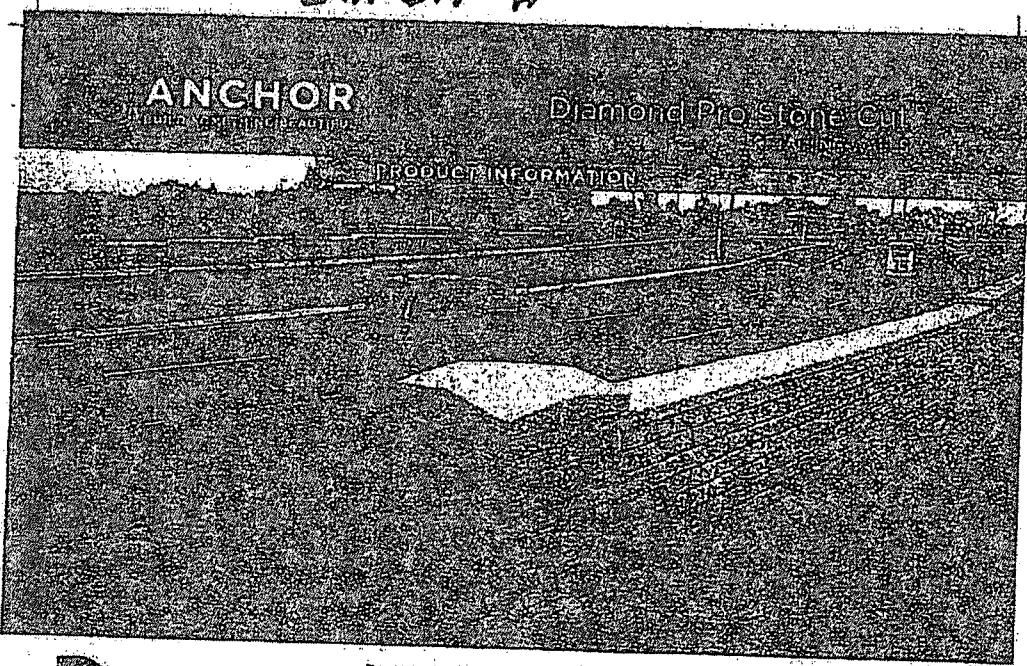
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Defendant's Trial Exhibit #38.....1000

V. CERTIFICATE OF COUNSEL.....1006

EXHIBIT "H"



See ANCHORWALL.COM for installation instructions.

Renowned for its rough-hewn face and earthen tones, the Diamond Pro Stone-Cut™ product imparts landscapes with a rich, faceted beauty not commonly found in commercial retaining walls.

The performance characteristics make it the proven solution for tall walls, Department of Transportation projects, commercial developments, water applications and other critical wall needs.

- Patented rear-rip technology
- Can be used to build gravity walls up to 3 feet, 4 inches high (including buried course)
- Taller walls can be built with geosynthetic reinforcement when designed by a qualified engineer
- ICC evaluated

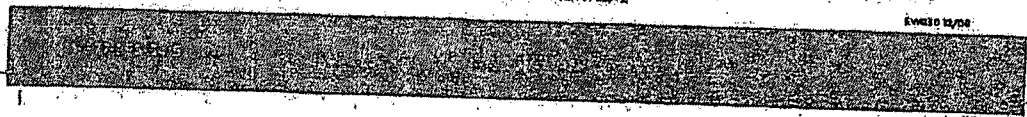


Units	Wall	Cap	Corner
Approximate Dimensions*	8" x 16" x 12"	Front: 4" x 17-1/4" x 10-3/8" Back: 4" x 12" x 10-3/8"	8" x 16" x 9"
Approximate Weight*	77 lbs.	40 lbs.	101 lbs.
Coverage*	10 sq. ft.	12 linear ft.	101 lbs.
Setback/Batter	1/2"		
Minimum Inside Radius	4'		
Minimum Outside Radius	7'		

*Actual dimensions and weights may vary from these approximate dimensions due to variations in manufacturing processes. Specifications may change without notice. See your Anchor representative for details, color chart, block dimensions and technical information.

©2005 Anchor Wall Systems, Inc. Diamond Pro Stone-Cut™ retaining wall blocks are manufactured under license from Anchor Wall Systems, Inc. Diamond Pro Stone-Cut and the Anchor Wall Systems logo are trademarks of Anchor Wall Systems, Inc. Diamond Pro Stone-Cut blocks are covered by the Anchor Wall Systems, Inc. Limited Warranty. For a complete copy of the warranty, please contact Anchor Wall Systems at www.anchorwall.com, Anchor Wall Systems, Inc., 2025 Oakwood Road, Suite 200, Mechanicsville, MD 21102.

Exhibit type



(Handwritten signature)

EXHIBIT H

DIAMOND PRO® INSTALLATION INSTRUCTIONS

Wall Construction

STAKE OUT THE WALL

Have a surveyor stake out the wall's placement. Verify the locations with the project supervisor.

EXCAVATION - Diagram 1

Excavate for the leveling pad to the lines and grades shown on the approved plans, and excavate enough soil from behind the wall for the geogrid/reinforcement material. The trench for the leveling pad should be at least 24 inches wide and a minimum of 14 inches deep, enough to bury the first course below grade plus 8 inches for the leveling pad. Excavate to a minimum of 8 inches or 10 percent of the total wall height (whichever is greater) below grade.

LEVELING PAD - Diagram 2

An aggregate leveling pad is made of compatible base material of 1/2-inch minus with fines. It is placed along the wall front wall change elevation, the leveling pad may be stepped up by the height of the block (typically 8-inch increments) to match the grade change. Always start at the lowest level and work upward. Compact the aggregate, making sure it's level, front to back, and side to side. Blast lightly with water before compaction, if needed.

BASE COURSE - Diagram 3

This is the most important step in the installation process. Bury the base course of blocks. Begin laying blocks at the lowest elevation of the wall. Remove the rear lip of the block so that it will fit flat on the leveling pad. Place the blocks side by side, flush against each other, and make sure the blocks are in full contact with the leveling pad. Level front to back and side to side. If the wall is on an incline, don't force the blocks. Set them up as they remain consistently level. Use string to check for proper alignment.

CONSTRUCTION OF THE NEXT COURSE - Diagrams 4 and 5

You must fill every 4-inch drain elongate stone prior to laying the next course of block. Clean any debris off the top of the blocks. Place the second course of blocks on top of the base course. Minimize remaining voids. Pull each block forward as far as possible to ensure the correct interlock. Fill all voids between and within blocks with drainage aggregate. Backfill with drainage aggregate directly behind the block, adding 6 to 8 inches at a time, followed by proper compaction. Add soil fill behind the aggregate. Compact before the next course is laid. Don't drive heavy equipment near the wall. Self-propelled compaction equipment should not be used within 3 feet of the back of the wall. You'll need manual units to stay on hand. A mobility saw is recommended for cutting panels until the safety glasses and other protective equipment when cutting.

DRAINAGE DESIGN - Diagram 6

Each project is unique. The grades on your site will determine what level to install the drain tile. Place the drain tile (4-inch perforated piping) so water will drain down and away from the wall into a storm drain or sump pit just above grade. Fill in the area behind the block with clean drainage aggregate. At least 12 inches from the wall. You may need to place and backfill several courses to achieve the proper drainage level. The drain tile outlet pipes should be spaced not more than every 50 feet and at low points of the wall. In order for the drainage aggregate to function properly, it must keep clear of regular soil fill.

COMPACTION - Diagram 7

Shovel the backfill soil behind the drainage aggregate and compact the backfill with a hand-operated tamper. Make sure the aggregate is level and slightly below the top of the base course. Place soil in front of the base course and compact. Base course should be tamped. Continue to fill and compact after each course is laid.

REINFORCEMENT (IF REQUIRED)

Geogrid reinforcement is recommended for walls taller than 40 inches in walls situated in poor soils, supporting a driveway etc. Consult an engineer for design assistance. Check the wall construction plan to determine which courses will need reinforcement. Clean any debris off the top layer of blocks. Measure and cut the reinforcement to the design length in the plane. The reinforcement has a design strength direction, which must be laid perpendicular to the wall. Place the front edge of the material on the top course, 1 to 2 inches from the face of the block. Apply the next course of blocks to secure it in place. To keep it from wrinkling, pull the reinforcement taut and pin the back edge in place with stakes or stakes. Add drainage aggregate behind the blocks, then add the infill soil and compact it. Remember to place the front edge of the reinforcement on top of the block, making sure it's within 1 to 2 inches of the face of the block. Correct placement ensures that you maximize the connection strength and keep the batter consistent. A minimum of 6 inches of backfill is required prior to operating vehicles on the reinforcement.

CAPPING A WALL

Always start capping from the lowest elevation. If your wall elevation changes, caps can be stacked where the wall starts to. Begin laying caps at the elevation change and work back toward the previous step up. Cut caps with a diamond-blade saw as fits needed. Carefully adhere with a high-strength concrete adhesive.

FINISH GRADE AND SURFACE DRAINAGE - Diagram 8

Protect the wall with a finished grade at the top and bottom. To ensure proper water drainage away from the wall, use 8 inches of fill with low permeability and sand to stabilize the surface. Consult the wall design engineer if water may be directed toward the wall. If needed, create a grade to direct water away from the wall. This will minimize water seeping into the soil and drainage aggregate behind the wall.

SITE CLEANUP AND RESTORATION

Scrub off the soil and pick up any debris left from the construction process. Notify the job superintendent in writing of the completion and that it is ready for final inspection and acceptance. Planting vegetation in front and on top of the wall will help reduce the chance of erosion. Following these Best Practices for construction will ensure the success of your Anchor Wall Systems retaining wall. These instructions are meant as general guidelines. Site-specific conditions may warrant additional installation requirements. Know-It-All Systems recommends you consult a professional engineer to design walls over 40 inches and have your completion tested by a qualified geotechnical engineer.

SAFETY NOTE: Always use appropriate equipment, including safety glasses or goggles and respirators, when splitting, cutting or hammering units.

*Detailed how-to methods shown on video.

*Material dimensions, weight and weight may vary from those provided. Consult the manufacturer for details, tolerances, back dimensions and additional information.



Di. 1 - Excavation



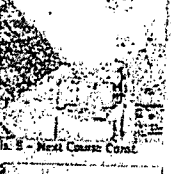
Di. 2 - Leveling Pad



Di. 3 - Base Course



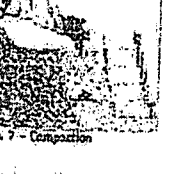
Di. 4 - Cap Fit



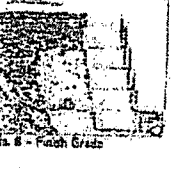
Di. 5 - Next Course Const



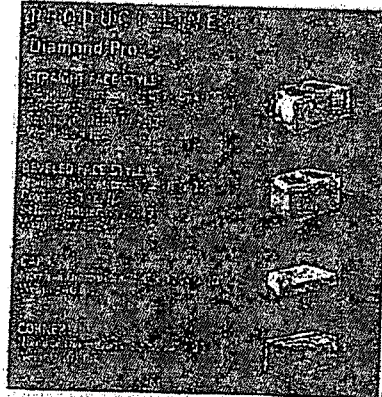
Di. 6 - Drainage



Di. 7 - Compaction



Di. 8 - Finish Grade

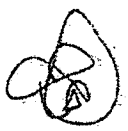


Anchor
RETAINING WALL SYSTEMS
anchorwall.com

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5500 Baker Road, Suite 200
Minnetonka, MN 55345-5204 USA

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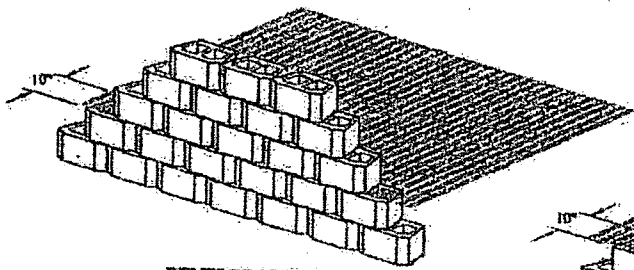


www.anchorwall.com

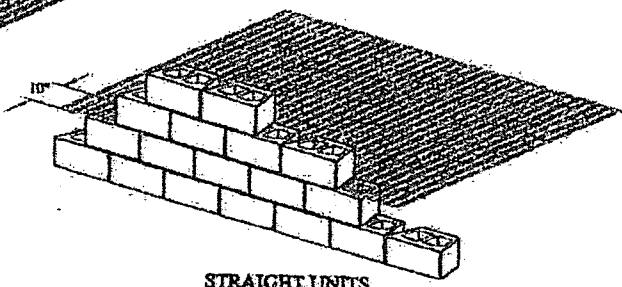
Toll-Free Customer Service: (877) 395-3415

Diamond Pro-Grid-Component

EXHIBIT "H"

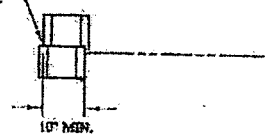


BEVELED UNITS



STRAIGHT UNITS

EXTEND GEOSYNTHETIC REINFORCEMENT TO WITHIN 2" OF THE LOWER BLOCK FACE



ANCHOR
 BUILT SOMETHING BEAUTIFUL
 Anchor Wall Engineering, LLC
 3939 Baker Road, Suite 390
 Minneapolis, MN 55345

These graphic representations are intended for preliminary design purposes only and are not to be used for construction without the signature of a registered professional engineer.

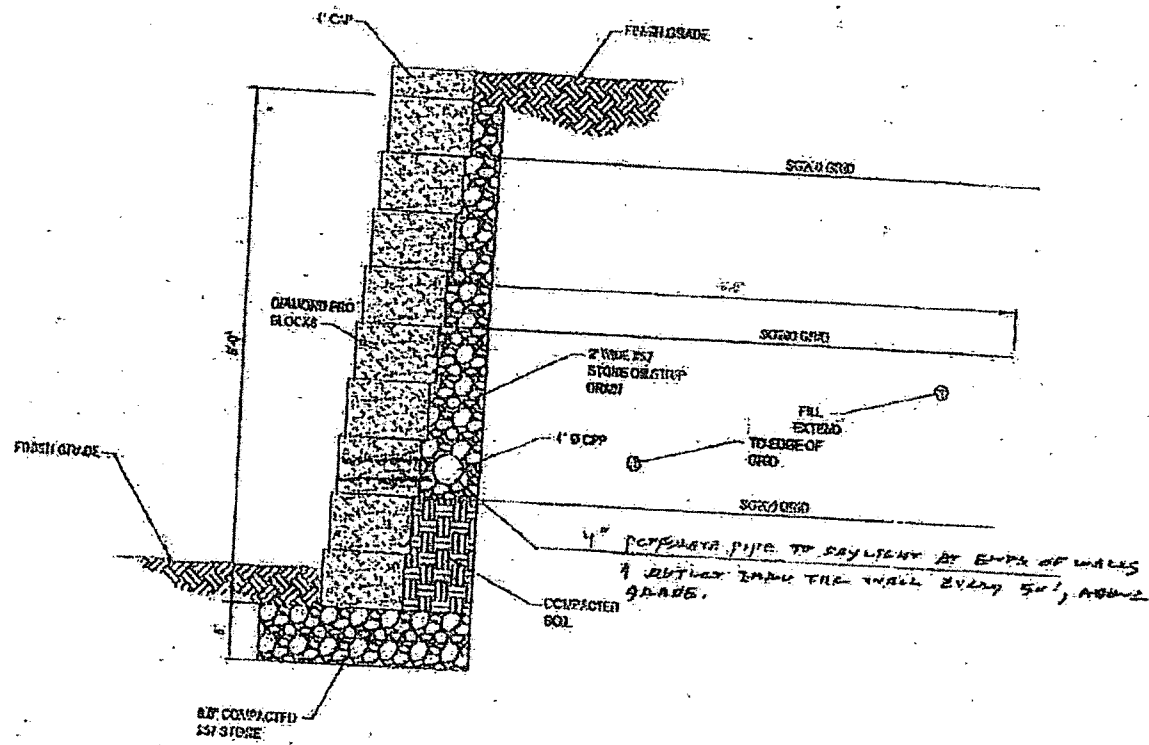
©2008 Anchor Wall Engineering, LLC
 © and TM Anchor Wall Systems, Inc.

Drawn by: AWE
 Date: 3/18/2008
 Scale: None

Drawn Title: Diamond Pro® Retaining Wall System Reinforcement Connection Detail

Project Information: Typical Retaining Wall Details
 www.anchorwall.com

EXHIBIT "H"



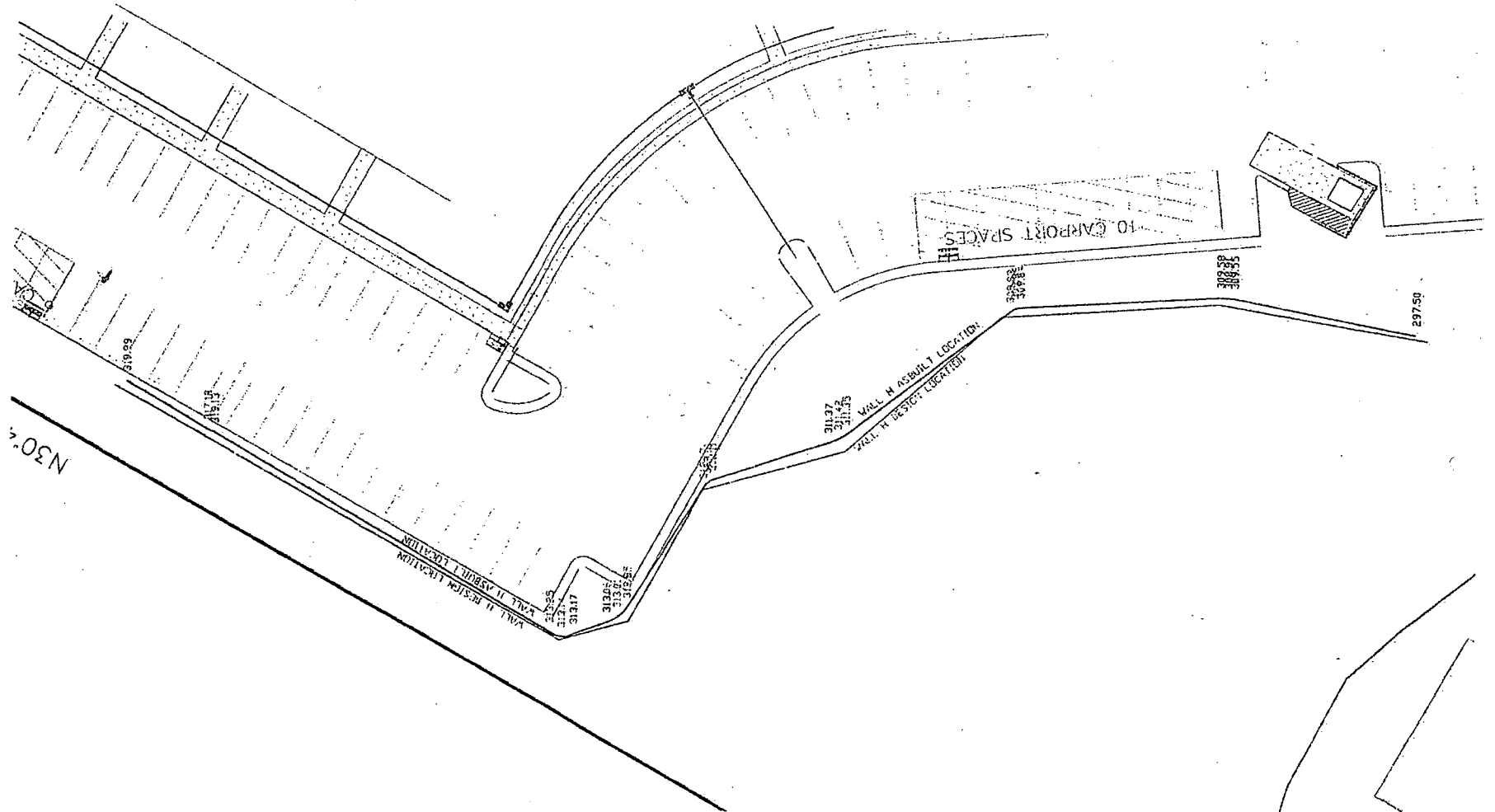
RETAINING WALL SECTION DETAIL
NOT TO SCALE



EXHIBIT E

Coogler Construction, Inc Equipment Rental Pricing Sheet (Hourly Rate) CONTRACTORS EDITION

CAT 621 #1	\$ 125.00	Truck #4 - Rock Pro	\$ 85.00
CAT 621 #2	\$ 125.00	Lowboy #5	\$ 105.00
CAT 621 #3	\$ 125.00	Truck #8	\$ 60.00
9400 #1	\$ 135.00	Truck #9	\$ 85.00
9400 #2	\$ 135.00	Lowboy #16	\$ 135.00
Water Pan	\$ 110.00	Water Truck	\$ 75.00
613C Pan	\$ 100.00	Fuel Truck	\$ 85.00
615C Pan	\$ 115.00	Cut Off Saw	\$ 38.50
315 Excavator	\$ 95.00	Laborer	\$ 40.00
320 Excavator	\$ 100.00	Superintendent / Supervisor	\$ 65.00
322 Excavator	\$ 125.00	GPS System	\$ 85.00
322 CFM	\$ 160.00	Operator Only	\$ 55.00
330 Excavator	\$ 130.00	RM250 application dirt	\$ 195.00
50 Hitachi Mini Excavator	\$ 75.00	RM250 application asphalt	\$ 290.00
345 BL #1 Excavator	\$ 160.00	4710 Peterson Grinder	\$ 560.00
345 BL #2 Excavator	\$ 160.00	MT 297 Disc Tractor	\$ 65.00
350 Hitachi	\$ 140.00	Case Box Blade	\$ 80.00
450 Hitachi	\$ 160.00	225 Hammer	\$ 180.00
27 ZTS (John Deere)	\$ 75.00	Broom Tractor	\$ 75.00
700J Dozer	\$ 105.00	Terex 3566 #1	\$ 130.00
420D Backhoe	\$ 85.00	Terex 3566 #2	\$ 130.00
D6G Dozer	\$ 90.00	Terex 3566 #3	\$ 130.00
D6H Dozer	\$ 110.00	Terex 40 #1	\$ 140.00
D6R Dozer	\$ 120.00	Terex 40 #2	\$ 140.00
D6N Dozer	\$ 130.00	Tri Axle Dump Trucks	\$ 75.00
D6R Dozer	\$ 170.00		
644G Loader	\$ 90.00		
624G Loader	\$ 95.00		
953 Loader	\$ 100.00		
950G Loader	\$ 110.00		
Skid Steer 257B	\$ 75.00		
626 CAT Skidder	\$ 120.00		
670B Grader	\$ 110.00		
12H Grader #1	\$ 110.00		
12H Grader #2	\$ 110.00		
12H Grader #3	\$ 110.00		
CAT 433 Roller	\$ 80.00		
Dynapac Roller #1	\$ 80.00		
863 Roller	\$ 88.00		
Ramox Walking Roller	\$ 65.00		
Vibromax Roller	\$ 85.00		
815 Roller	\$ 110.00		
Wacker Packer	\$ 48.50		



Coogler 000268

Δ π EXHIBIT	45
Deponent	30(b)(6)
Date	3-9-17
Rpt.	4B
WWW.DEFOBOOK.COM	

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
COURT OF COMMON PLEAS

Joseph M. Strickland, Master-in-Equity Judge

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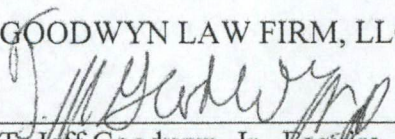
v.

Coogler Construction Company, Inc.,.....Respondent.

CERTIFICATE OF COUNSEL

The undersigned hereby certifies that this Record on Appeal contains all materials proposed to be included by any of the parties and not any other material.

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February 19, 2019