

90352

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2015-CP-26-00279

**RECEIVED**  
JUL 22 2019  
SC Court of Appeals

Ex Parte: American Empire Surplus Lines Insurance Company, Appellant,

In Re: The River Crossing Condominium Association, and Vincent J. Tamburro, on behalf of himself and others similarly situated, Plaintiffs,

v.

Centex Homes, a Nevada General Partnership; Centex Construction Company, Inc.; Centex Construction, LLC; Centex-Rooney Construction, Co., Inc.; Centex-Rodgers, Inc.; Balfour Beatty Construction, LLC, f/k/a Centex Construction, LLC; Right Way Construction, Inc.; Right Way Group, Inc.; RWG, Inc., RWGR, Inc.; Stock Building Supply, LLC f/k/a Stock Building Supply, Inc., Builders FirstSource – Southeast Group, LLC, Martin Masonry, Inc., Gary Hunnell d/b/a Grand Strand Roofing, Craftmaster Manufacturing, Inc. d/b/a CMI, Roof Doctor of the Carolinas, Inc., Stock Building Supply, LLC f/k/a Carolina Builders Corporation, Orfield Laboratories, Inc., Trebor Industries, Inc., Steven Bosch, d/b/a The Roofer Man, Certainteed Corporation Successor by merger to Exterior Systems, Inc., a/k/a Norandex, Inc., Weather Protection Systems, Inc., Crawford Door Systems, Inc., Cox Millwork & Supply, Inc., AM Jacobs, Inc., Galvin Depompe, Roberta Depompe, Morningstar Consultants, Inc., Jeld-Wen, Inc. as successor to and/or merger with Craftmaster Manufacturing, Inc., d/b/a CMI, and Sign Studio & Graphics, Inc., Defendants,

Centex Homes, a Nevada General Partnership, Third-Party Plaintiff,

v.

Carolina Drywall and Interiors a/k/a Carolina Drywall Contractors, Inc., Vance Johnson Plumbing Co., Inc., Bogle Electric, Inc., Pelen, Inc., Jayco, Inc., Sunland Fire Protection, Inc., Dunn Plumbing Company, Inc., Essentials Protective Coatings, Inc., RJM Plumbing, Inc., Myrtle Beach Lighting, Inc. a/k/a R&L Lighting, Inc., Tri-City Insulation and Building Products of Myrtle Beach, Inc., Bond Group, Inc., Intracoastal Service Company, Inc., Sandpiper Heating & Air Conditioning, LLC, American Residential Services, LLC d/b/a American Residential Services of South Carolina, Inc., A.O. Hardee & Son, Inc., Vereen Concrete Co., Inc., Michael Dawson d/b/a Michael Dawson Construction, Inc., Floors, Inc. successor by merger to Rice Planter Carpets, Inc., I.T.P., Inc., Carpets By Kendall, Inc., Rice Planter Carpets, Inc. n/k/a Creative Touch Interiors, Inc., CEMS Engineering, Inc., Chris R. Clark, AIA, Crescent Architects, LLC, Bobby L. Curry,

Bobby Curry Engineers, Inc., and Right Way Construction, Inc. a/k/a RWG, Inc. a/k/a Right Way Group, Inc. a/k/a RWGR, Inc., Third-Party Defendants,

Of which The River Crossing Condominium Association, and Vincent J. Tamburro, on behalf of himself and others similarly situated, and Centex Homes, a Nevada General Partnership, are the Respondents.

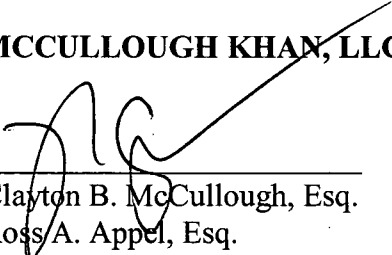
---

NOTICE OF APPEAL

---

American Empire Surplus Lines Insurance Company appeals the Honorable Clifton Newman's Order Denying Motions to Intervene, dated June 21, 2019. Appellant received written notice of entry of the order on June 21, 2019.

**MCCULLOUGH KHAN, LLC**



---

Clayton B. McCullough, Esq.  
Ross A. Appel, Esq.  
359 King Street, Suite 200  
Charleston, SC 29401  
(843) 937-0400  
(843) 937-0706 (fax)  
[clay@mklawsc.com](mailto:clay@mklawsc.com)

ATTORNEY FOR AMERICAN EMPIRE  
SURPLUS LINES INSURANCE COMPANY

July 19, 2019  
Charleston, South Carolina

Phillip W. Segui, Jr., Esquire  
Mary Abigail Young, Esquire  
Segui Law Firm  
864 Lowcountry Blvd. #A  
Mt. Pleasant, SC 29464

Attorneys for Respondents The River Crossing  
Condominium Association, and Vincent J.  
Tamburro, on behalf of himself and others  
similarly situated

John T. Chakeris, Esquire  
Chakeris Law Firm  
231 Calhoun Street  
Charleston SC 29403

Attorney for Respondents The River Crossing  
Condominium Association, and Vincent J.  
Tamburro, on behalf of himself and others  
similarly situated

Shaun W. Cranford, Esquire  
Cranford Law  
P.O. Box 50684  
Columbia, SC 29250  
Attorney for Respondents The River Crossing  
Condominium Association, and Vincent J.  
Tamburro, on behalf of himself and others  
similarly situated

Laura F. Locklair, Esquire  
Boyle, Leonard & Anderson P.A.  
28 Hasell Street  
Charleston, SC 29401  
Attorney for Respondent Centex Homes, a  
Nevada General Partnership; Centex  
Construction Company, Inc.; Centex  
Construction, LLC; Centex-Rooney  
Construction Co., Inc.; Centex-Rodgers, Inc.;  
and Balfour Beatty Construction, LLC f/k/a  
Centex Construction, LLC

Brian Wolfe, Esquire  
Baucom, Claytor, Benton, Morgan & Wood,  
P.A.  
200 Providence Road, Suite 106  
Charlotte, NC 28207  
Attorney for Defendant Roof Doctor of the  
Carolinas, Inc.

Jeffrey A. Ross, Esquire  
Philip Cristaldi, Esquire  
Ross, Cangelosi & Associates  
1156 Bowman Rd., Suite 200  
Mount Pleasant, SC 29464  
Attorneys for Defendant Martin Masonry, Inc

Paul Rahn, Esquire  
Roberson Hollingsworth Manos & Rahn,  
Wells Fargo Center  
177 Meeting Street, Suite 300  
Charleston, SC 29401  
Attorney for Defendant Trebor Industries, Inc.

Thomas C. Hildebrand, Jr., Esquire  
Will G. DesChamps, IV, Esquire  
Parker Poe Adams & Bernstein LLP  
200 Meeting St., Suite 301  
Charleston, SC 29401  
Attorneys for Respondent Centex Homes, a  
Nevada General Partnership; Centex  
Construction Company, Inc.; Centex  
Construction, LLC; Centex-Rooney  
Construction Co., Inc.; Centex-Rodgers, Inc.;  
and Balfour Beatty Construction, LLC f/k/a  
Centex Construction, LLC

Theodore Parker, III, Esquire  
Jacqueline Dixon Phillips, Esquire  
Carlton Bowers, Esquire  
Parker Nelson & Associates  
211 King Street, Suite 202  
Charleston, SC 29401  
Attorneys for Defendant Stock Building  
Supply, LLC f/k/a Stock Building Supply,  
Inc.

E. Glenn Elliott, Esquire  
Aiken, Bridges, Elliott, Tyler & Saleeby, PA  
P.O. Drawer 1931  
Florence, SC 29503  
Attorney for Defendant Gary Hunnell d/b/a  
Grand Strand Roofing

Theodore L Manos, Esquire  
Michael E. Wright, Esquire  
Roberson Hollingsworth Manos & Rahn,  
LLC  
550 King Street, Suite 300  
Charleston, SC 29403  
Attorneys for Defendant RWG, Inc.

Robert Kennedy, Esquire  
Phelps Dunbar LLP  
GlenLake One  
4140 ParkLake Avenue, Suite 100  
Raleigh, North Carolina 27612  
Attorney for Scottsdale Insurance Company

Stephen Hughes, Esquire  
David Black, Esquire  
Howell Gibson & Hughes, PA  
P.O. Box 40  
Beaufort, SC 29901  
Attorneys for Defendant Builders FirstSource-  
Southeast Group, LLC

Shanna Stephens, Esquire  
Anderson Reynolds & Stephens, LLC  
37 1/2 Broad Street  
P.O. Box 87  
Charleston, SC 29402  
Attorney for Third-Party Defendant Carolina  
Drywall & Interiors, Inc. and Carolina Drywall  
Contractors, Inc.

Sarah E. Wetmore, Esquire  
Madison B. Suttie, Esquire  
Carlock, Copeland & Stair, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
Attorneys for Defendant Weather Protection  
Systems, Inc.

Steven A. Meckler, Esquire  
Christian Staples, Esquire  
Shumaker, Loop & Kendrick, LLP  
101 S. Tryon Street, Suite 2200  
Charlotte, NC 28280  
Attorneys for Defendant Jeld-Wen, Inc., as  
successor to and/or merger with Craftmaster  
Manufacturing, Inc. d/b/a CMI and the party  
improperly identified as Craftmaster  
Manufacturing, Inc. d/b/a CMI

Dunn D. Hollingsworth, Esquire  
Jillian S. Barton, Esquire  
Robertson Hollingsworth Manos & Rahn,  
LLC  
550 King Street, Suite 300  
Charleston, SC 29403  
Attorneys for Defendant Crawford Door  
Systems, Inc.

James M. Saleeby, Jr., Esquire  
Preston Dawkins, Esquire  
Aiken Bridges Elliott Tyler & Saleeby, PA  
P.O. Drawer 1931  
Florence, SC 29503  
Attorneys for Defendant Morningstar  
Consultants, Inc.

Joseph K. Carter Jr., Esquire  
Turner Padgett Graham & Laney, PA  
P.O. Box 1473  
Columbia, SC 29202  
Attorney for Third-Party Defendant Tri-City  
Insulation & Building Products of Myrtle  
Beach, Inc.

Edward D. Buckley, Jr., Esquire  
Nicholas J. Rivera, Esquire  
Young Clements Rivers, LLP  
P.O. Box 993  
Charleston, SC 29402  
Attorneys for Defendant A.M. Jacob, Inc.

Kevin C. Mims, Esquire  
Timothy C. Dargan, Esquire  
Luzuriaga Mims, LLP  
50 Immigration Street, Suite 200  
Charleston, SC 29403  
Attorneys for Defendant Crawford Door  
Systems, Inc.

Christina A. Bisset, Esquire  
Mcangus, Goudelock & Courie, LLC  
PO Box 1349  
Myrtle Beach, SC 29578  
Attorney for Third-Party Defendant Sunland  
Fire Protection, Inc.

Robert C. Calamari, Esquire  
Nelson Mullins Riley & Scarborough, LLP  
Post Office Box 3939  
Myrtle Beach, SC 29578  
Attorney for Selective Insurance Company of  
South Carolina and Harleysville Insurance  
Company n/k/a Nationwide Insurance  
Company

Lawrence Hunter, Esquire  
Hunter & Foster, P.A.  
Post Office Box 10309  
Greenville, S.C. 29603  
Attorney for BITCO General Insurance  
Corporation

Neil S. Haldrup, Esquire  
Thomas B. Boger, Esquire  
Wall Templeton & Haldrup, P.A.  
Post Office Box 1200  
Charleston, SC 29401  
Attorneys for Appellant Clarendon National  
Insurance Company, Successor By Merger to  
Clarendon America Insurance Company

Mark S. Barrow, Esquire  
Christy E. Mahon, Esquire  
Sweeny, Wingate & Barrow, P.A.  
Post Office Box 12129  
Columbia, South Carolina 29211  
Attorneys for Appellants Hartford Fire  
Insurance Company and Hartford Casualty  
Insurance Company

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Clifton Newman, Circuit Court Judge

Case No. 2015-CP-26-00279

**RECEIVED**  
JUL 22 2019  
SC Court of Appeals

Ex Parte: American Empire Surplus Lines Insurance Company, Appellant,

In Re: The River Crossing Condominium Association, and Vincent J. Tamburro, on behalf of himself and others similarly situated, Plaintiffs,

v.

Centex Homes, a Nevada General Partnership; Centex Construction Company, Inc.; Centex Construction, LLC; Centex-Rooney Construction, Co., Inc.; Centex-Rodgers, Inc.; Balfour Beatty Construction, LLC, f/k/a Centex Construction, LLC; Right Way Construction, Inc.; Right Way Group, Inc.; RWG, Inc., RWGR, Inc.; Stock Building Supply, LLC f/k/a Stock Building Supply, Inc., Builders FirstSource – Southeast Group, LLC, Martin Masonry, Inc., Gary Hunnell d/b/a Grand Strand Roofing, Craftmaster Manufacturing, Inc. d/b/a CMI, Roof Doctor of the Carolinas, Inc., Stock Building Supply, LLC f/k/a Carolina Builders Corporation, Orfield Laboratories, Inc., Trebor Industries, Inc., Steven Bosch, d/b/a The Roofer Man, Certainteed Corporation Successor by merger to Exterior Systems, Inc., a/k/a Norandex, Inc., Weather Protection Systems, Inc., Crawford Door Systems, Inc., Cox Millwork & Supply, Inc., AM Jacobs, Inc., Galvin Depompe, Roberta Depompe, Morningstar Consultants, Inc., Jeld-Wen, Inc. as successor to and/or merger with Craftmaster Manufacturing, Inc., d/b/a CMI, and Sign Studio & Graphics, Inc., Defendants,

Centex Homes, a Nevada General Partnership, Third-Party Plaintiff,

v.

Carolina Drywall and Interiors a/k/a Carolina Drywall Contractors, Inc., Vance Johnson Plumbing Co., Inc., Bogle Electric, Inc., Pelen, Inc., Jayco, Inc., Sunland Fire Protection, Inc., Dunn Plumbing Company, Inc., Essentials Protective Coatings, Inc., RJM Plumbing, Inc., Myrtle Beach Lighting, Inc. a/k/a R&L Lighting, Inc., Tri-City Insulation and Building Products of Myrtle Beach, Inc., Bond Group, Inc., Intracoastal Service Company, Inc., Sandpiper Heating & Air Conditioning, LLC, American Residential Services, LLC d/b/a American Residential Services of South Carolina, Inc., A.O. Hardee & Son, Inc., Vereen Concrete Co., Inc., Michael Dawson d/b/a Michael Dawson Construction, Inc., Floors, Inc. successor by merger to Rice Planter Carpets, Inc., I.T.P., Inc., Carpets By Kendall, Inc., Rice Planter Carpets, Inc. n/k/a Creative Touch Interiors, Inc., CEMS Engineering, Inc., Chris R. Clark, AIA, Crescent Architects, LLC, Bobby L. Curry,

Bobby Curry Engineers, Inc., and Right Way Construction, Inc. a/k/a RWG, Inc. a/k/a Right Way Group, Inc. a/k/a RWGR, Inc., Third-Party Defendants,

Of which The River Crossing Condominium Association, and Vincent J. Tamburro, on behalf of himself and others similarly situated, and Centex Homes, a Nevada General Partnership, are the Respondents.

---

**PROOF OF SERVICE**

---

I certify that I have served the Notice of Appeal on Respondents and the parties of record by depositing a copy of it in the United States Mail, postage prepaid, on July 19, 2019 addressed to their attorneys of record, listed as follows:

Phillip W. Segui, Jr., Esquire  
Mary Abigail Young, Esquire  
Segui Law Firm  
864 Lowcountry Blvd. #A  
Mt. Pleasant, SC 29464

Attorneys for Respondents The River Crossing Condominium Association, and Vincent J. Tamburro, on behalf of himself and others similarly situated

Shaun W. Cranford, Esquire  
Cranford Law  
P.O. Box 50684  
Columbia, SC 29250

Attorney for Respondents The River Crossing Condominium Association, and Vincent J. Tamburro, on behalf of himself and others similarly situated

John T. Chakeris, Esquire  
Chakeris Law Firm  
231 Calhoun Street  
Charleston SC 29403

Attorney for Respondents The River Crossing Condominium Association, and Vincent J. Tamburro, on behalf of himself and others similarly situated

Thomas C. Hildebrand, Jr., Esquire  
Will G. DesChamps, IV, Esquire  
Parker Poe Adams & Bernstein LLP  
200 Meeting St., Suite 301  
Charleston, SC 29401

Attorneys for Respondent Centex Homes, a Nevada General Partnership; Centex Construction Company, Inc.; Centex Construction, LLC; Centex-Rooney Construction Co., Inc.; Centex-Rodgers, Inc.; and Balfour Beatty Construction, LLC f/k/a Centex Construction, LLC

Laura F. Locklair, Esquire  
Boyle, Leonard & Anderson P.A.  
28 Hasell Street  
Charleston, SC 29401  
Attorney for Respondent Centex Homes, a  
Nevada General Partnership; Centex  
Construction Company, Inc.; Centex  
Construction, LLC; Centex-Rooney  
Construction Co., Inc.; Centex-Rodgers, Inc.;  
and Balfour Beatty Construction, LLC f/k/a  
Centex Construction, LLC

Brian Wolfe, Esquire  
Baucom, Claytor, Benton, Morgan & Wood  
200 Providence Road, Suite 106  
Charlotte, NC 28207  
Attorney for Defendant Roof Doctor of the  
Carolinas, Inc.

Jeffrey A. Ross, Esquire  
Philip Cristaldi, Esquire  
Ross, Cangelosi & Associates  
1156 Bowman Rd., Suite 200  
Mount Pleasant, SC 29464  
Attorneys for Defendant Martin Masonry, Inc

Paul Rahn, Esquire  
Robertson Hollingsworth Manos & Rahn  
550 King Street, Suite 300  
Charleston, SC 29403  
Attorney for Defendant Trebor Industries,  
Inc..

Stephen Hughes, Esquire  
David Black, Esquire  
Howell Gibson & Hughes, PA  
P.O. Box 40  
Beaufort, SC 29901  
Attorneys for Defendant Builders FirstSource-  
Southeast Group, LLC

Theodore Parker, III, Esquire  
Jacqueline Dixon Phillips, Esquire  
Carlton Bowers, Esquire  
Parker Nelson & Associates  
211 King Street, Suite 202  
Charleston, SC 29401  
Attorneys for Defendant Stock Building  
Supply, LLC f/k/a Stock Building Supply,  
Inc.

E. Glenn Elliott, Esquire  
Aiken, Bridges, Elliott, Tyler & Saleeby, PA  
P.O. Drawer 1931  
Florence, SC 29503  
Attorney for Defendant Gary Hunnell d/b/a  
Grand Strand Roofing

Theodore L Manos, Esquire  
Michael E. Wright, Esquire  
Roberson Hollingsworth Manos & Rahn,  
LLC  
550 King Street, Suite 300  
Charleston, SC 29403  
Attorneys for Defendant RWG, Inc.

Robert Kennedy, Esquire  
Phelps Dunbar LLP  
GlenLake One  
4140 ParkLake Avenue, Suite 100  
Raleigh, North Carolina 27612  
Attorney for Scottsdale Insurance Company

James M. Saleeby, Jr., Esquire  
Preston Dawkins, Esquire  
Aiken Bridges Elliott Tyler & Saleeby, PA  
P.O. Drawer 1931  
Florence, SC 29503  
Attorneys for Defendant Morningstar  
Consultants, Inc.

Shanna Stephens, Esquire  
Anderson Reynolds & Stephens, LLC  
37 1/2 Broad Street  
P.O. Box 87  
Charleston, SC 29402  
Attorney for Third-Party Defendant Carolina  
Drywall & Interiors, Inc. and Carolina Drywall  
Contractors, Inc.

Sarah E. Wetmore, Esquire  
Madison B. Suttie, Esquire  
Carlock, Copeland & Stair, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401  
Attorneys for Defendant Weather Protection  
Systems, Inc.

Steven A. Meckler, Esquire  
Christian Staples, Esquire  
Shumaker, Loop & Kendrick, LLP  
101 S. Tryon Street, Suite 2200  
Charlotte, NC  
Attorneys for Defendant Jeld-Wen, Inc., as  
successor to and/or merger with Craftmaster  
Manufacturing, Inc. d/b/a CMI and the party  
improperly identified as Craftmaster  
Manufacturing, Inc. d/b/a CMI

Dunn D. Hollingsworth, Esquire  
Jillian S. Barton, Esquire  
Robertson Hollingsworth Manos & Rahn,  
LLC  
550 King Street, Suite 300  
Charleston, SC 29403  
Attorneys for Defendant Crawford Door  
Systems, Inc.

Robert C. Calamari, Esquire  
Nelson Mullins Riley & Scarborough, LLP  
3751 Robert M Grissom Parkway, Suite 300  
(29577-3165)  
Post Office Box 3939  
Myrtle Beach, SC 29578  
Attorney for Selective Insurance Company of  
South Carolina and Harleysville Insurance  
Company n/k/a Nationwide Insurance  
Company

Joseph K. Carter Jr., Esquire  
Turner Padgett Graham & Laney, PA  
P.O. Box 1473  
Columbia, SC 29202  
Attorney for Third-Party Defendant Tri-City  
Insulation & Building Products of Myrtle  
Beach, Inc.

Edward D. Buckley, Jr., Esquire  
Nicholas J. Rivera, Esquire  
Young Clements Rivers, LLP  
P.O. Box 993  
Charleston, SC 29402  
Attorneys for Defendant A.M. Jacob, Inc.

Kevin C. Mims, Esquire  
Timothy C. Dargan, Esquire  
Luzuriaga Mims, LLP  
50 Immigration Street, Suite 200  
Charleston, SC 29403  
Attorneys for Defendant Crawford Door  
Systems, Inc.

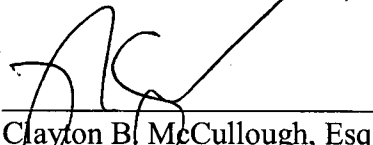
Christina A. Bisset, Esquire  
Mcangus, Goudelock & Courie, LLC  
PO Box 1349  
Myrtle Beach, SC 29578  
Attorney for Third-Party Defendant Sunland  
Fire Protection, Inc.

Lawrence Hunter, Esquire  
Hunter & Foster, P.A.  
Post Office Box 10309  
Greenville, S.C. 29603  
Attorney for BITCO General Insurance  
Corporation

Neil S. Haldrup, Esquire  
Thomas B. Boger, Esquire  
Wall Templeton & Haldrup, P.A.  
145 King Street, Suite 300  
Post Office Box 1200  
Charleston, SC 29401  
Attorneys for Appellant Clarendon National  
Insurance Company, Successor By Merger to  
Clarendon America Insurance Company

Mark S. Barrow, Esquire  
Christy E. Mahon, Esquire  
Sweeny, Wingate & Barrow, P.A.  
1515 Lady Street  
Post Office Box 12129  
Columbia, South Carolina 29211  
Attorneys for Appellants Hartford Fire  
Insurance Company and Hartford Casualty  
Insurance Company

**MCCULLOUGH KHAN, LLC**



---

Clayton B. McCullough, Esq.  
Ross A. Appel, Esq.  
359 King Street, Suite 200  
Charleston, SC 29401  
(843) 937-0400  
(843) 937-0706 (fax)  
[clay@mklawsc.com](mailto:clay@mklawsc.com)

ATTORNEY FOR AMERICAN EMPIRE  
SURPLUS LINES INSURANCE COMPANY

July 19, 2019  
Charleston, South Carolina



McCULLOUGH • KHAN, LLC  
ATTORNEYS AT LAW

Clayton B. McCullough  
Phone: (843) 937-0400  
Fax: (843) 937-0706  
[Clay@mklawsc.com](mailto:Clay@mklawsc.com)

July 19, 2019

**RECEIVED**

JUL 22 2019

SC Court of Appeals

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

**Re: The River Crossing Condominium Association, and Vincent J. Tamburro v.  
Centex Homes, et al.  
(Ex Parte: American Empire Surplus Lines Insurance Company)  
Civil Action No.: 2015-CP-26-00279**

Dear Ms. Kitchings:

Enclosed for filing, please find the following: the original and one (1) copy of Appellant's Notice of Appeal, the original and one (1) copy of the Proof of Service on counsel for the Respondents, the corresponding Order being challenged on appeal and our firm's check in the amount of \$250.00 to cover the associated filing fee.

Please file the original documents and return the clocked copies to our office in the enclosed, self-addressed, stamped envelope. Also, please note that the Notice of Appeal will also be filed with the Horry County Clerk of Court's office.

Thanks in advance for your assistance with this matter and please do not hesitate to contact me if you have any questions or need anything further. With kind regards, I remain

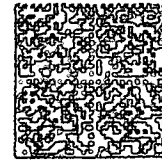
Sincerely yours,

McCULLOUGH KHAN, LLC

Clayton B. McCullough

CBM:kbn  
Enclosures  
cc: All Counsel

PRIORITY MAIL



US POSTAGE  
02 1P \$ 007.85<sup>00</sup>  
0001213627 JUL 19 2019  
MAILED FROM ZIP CODE 29401

RECEIVED  
JUL 22 2019  
SC Court of Appeals



359 King Street, Suite 200 • Charleston, SC 29401

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