

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Henry W. Brown  
Special Referee

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APPELLATE CASE NO.: 2019-000513

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**RECEIVED**  
DEC 16 2019  
SC Court of Appeals

Brown Contractors, LLC under S.C. Residential Builders License No. 20378,  
.....Appellant/Respondent,

v.

Andrew Joseph McMarlin a/k/a Andrew Joseph McMarlin and Amy Salzhauer,  
.....Respondents/Appellants,

And

Andrew McMarlin and Amy Salzhauer,  
.....Respondents/Appellants,

v.

James Brown IV and Brown-Meihaus Construction, LLC,  
.....Third-Party Defendants.

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**PROOF OF SERVICE – RECORD ON APPEAL VOLUME 1**

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The undersigned attorney for Appellants hereby certify that a true copy of the *Proof of Service - Record on Appeal Volume I* in the above-referenced matter has been served on all counsel of record by sending a copy via U.S. Mail on this the 13th day of December, 2019 to the following counsel:

Robert T. Lyles, Jr., Esquire  
Lyles & Associates, LLC  
342 East Bay Street  
Charleston, South Carolina 29401

(signature on following page)

*RB*

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Robert B. Varnado (SC Bar # 0007085)  
BROWN & VARNADO LLC  
P.O. Box 1127  
Mount Pleasant, South Carolina 29465  
(843) 737-7300

***Attorneys for Appellant/Respondent and  
Third-Party Defendants.***

December 13, 2019  
Mt. Pleasant, South Carolina

# BROWN & VARNADO<sub>LLC</sub>

ATTORNEYS AT LAW

103 CHURCH STREET (29464)  
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ROBERT B. VARNADO  
DIRECT: (843) 737-7301  
EMAIL: rvarnado@brown-varnado.com

December 13, 2019

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
200 Senate Street  
Columbia, SC 29201

**Re: *Brown Contractors, LLC v. Andrew McMarlin***  
Appellate Case No.: 2019-00513  
Our File No.: 6225.005

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DEC 16 2019  
SC Court of Appeals

Dear Ms. Kitchings:

Pursuant to Rule 210(a) of the South Carolina Appellate Court Rules, please find the ***Proof of Service of the Record on Appeal Volume 1.***

Thank you and with best regards, I remain

Very truly yours,

BROWN AND VARNADO LLC



Robert B. Varnado

RBV/am

cc: Robert T. Lyles, Jr., Esquire (w/ enclosure)

**BROWN &  
VARNADO** LLC  
ATTORNEYS AT LAW

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December 13, 2019

VIA U.S. MAIL

The Honorable V. Claire Allen  
Deputy Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**Re: *Brown Contractors, LLC v. Andrew McMarlin***  
Appellate Case No.: 2019-00513  
Our File No.: 6225.005

**RECEIVED**  
DEC 16 2019  
SC Court of Appeals

Dear Ms. Allen:

Enclosed find original and six (6) copies the *Appellant/Respondent's Motion to File Record on Appeal Out of Time*, and my firm's check in the amount of \$50.00 to cover the filing fee.

Thank you and with best regards, I remain

Very truly yours,

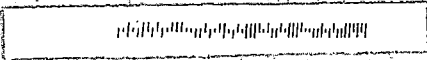
BROWN AND VARNADO LLC



Robert B. Varnado

RBV/am

cc: Robert T. Lyles, Jr., Esquire (w/ enclosure)



**RECEIVED**  
DEC 16 2016  
SC Court of Appeals

Brown & Varnado, LLC  
P.O. Box 1127  
Mount Pleasant, SC 29465

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The Honorable V. Claire Allen  
Dep. Clerk, S.C. Court of Appeals  
1220 Senate Street  
Columbia, SC 29201