

**THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT**

---

**RECEIVED**

**Oct 20 2020**

**S.C. SUPREME COURT**

Appeal from Charleston County  
Court of Common Pleas

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

---

Case No. 2013-CP-10-03251  
Appellate Case No. 2019-002046

---

On Writ of Certiorari to the Court of Appeals

---

Rosemary Connelly,

Respondent,

v.

Winsor Custom Homes, LLC,

Petitioner.

---

**PROOF OF SERVICE**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Russell G. Hines (SC Bar No. 72100)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 720-5488

*Attorneys for Petitioner*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Petitioner, Winsor Custom Homes, LLC, certify that the **REPLY BRIEF OF PETITIONER** was served on Respondent, Rosemary Connelly, on October 19, 2020, via email (see attached) to her counsel of record:

Christy Ford Allen, Esquire  
John A. Massalon, Esquire  
Wills Massalon & Allen LLC  
P.O. Box 859  
Charleston, SC 29402  
*Attorneys for Respondent*

Respectfully submitted,  
YOUNG CLEMENT RIVERS, LLP

By: s/Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
*Attorneys for Petitioner*

Charleston, South Carolina

October 19, 2020