

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

Appeal from Charleston County  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

Case No. 2015-CP-10-00955  
Appellate Case No. 2019-001520

**RECEIVED**

**Oct 19 2020**

**SC Court of Appeals**

Palmetto Pointe at Peas Island Condominium Property  
Owners Association, Inc., and Jack Love, individually, and  
on behalf of all others similarly situated,

Appellants,

v.

Island Pointe, LLC, Complete Building Corporation, Tri-  
County Roofing, Inc., WC Services, Inc., Miracle Siding,  
LLC and Wilson Lucas Sales d/b/a Miracle Siding, LLC,  
Eloy Alonzo Vasquez, JMC Construction, Inc., and JMC  
Construction, LLC,

Defendants,

Of whom WC Services, Inc., is the

Respondent.

**PROOF OF SERVICE**

Justin O. Lucey (SC Bar No. 15438)  
Joshua F. Evans (SC Bar No. 77448)  
Sohayla R. Townes (SC Bar No. 102814)  
JUSTIN O'TOOLE LUCEY, P.A.  
415 Mill Street  
Mt. Pleasant, South Carolina 29464  
P.O. Box 806 (29465)  
(843) 849-8400

*Attorneys for Appellants*

Edward D. Buckley, Jr. (SC Bar No. 994)  
YOUNG CLEMENT RIVERS, LLP  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 724-5446

*Attorneys for Appellants*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Appellants, Palmetto Pointe at Peas Island Condominium Property Owners Association, Inc., and Jack Love, individually, and on behalf of all others similarly situated, certify that the **FINAL BRIEF OF APPELLANTS** and the **CERTIFICATION FOR FINAL BRIEF OF APPELLANTS** were served on all other parties to this appeal on October 19, 2020, via email (see attached) to their following counsel of record:

James A. Atkins, Esquire  
CLAWSON AND STAUBES, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

*Attorneys for Respondent  
WC Services, Inc.*

Respectfully submitted,

By: /s/ Russell G. Hines  
Russell G. Hines (SC Bar No. 72100)  
YOUNG CLEMENT RIVERS, LLP  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
(843) 724-5446

Dated: October 19, 2020  
Charleston, South Carolina

**From:** [Hines, Russell](mailto:Hines, Russell)  
**To:** "[jatkins@clawsonandstaubes.com](mailto:jatkins@clawsonandstaubes.com)"  
**Cc:** "[Anna McCann](mailto:AnnaMcCann@lucey-law.com)"; "[Justin Lucey](mailto:JustinLucey@lucey-law.com)"; [Mixson, Kathryn](mailto:Mixson, Kathryn); "[Josh Evans](mailto:JoshEvans@lucey-law.com)"; "[Lee Weiland](mailto:LeeWeiland@lucey-law.com)"; [DeMato, Amanda](mailto:DeMato, Amanda); "[Stephanie Drawdy](mailto:StephanieDrawdy@lucey-law.com)"; [Justman, Aimee](mailto:Justman, Aimee); [Bell, Pollyana \(Polly\)](mailto:Bell, Pollyana (Polly)); [Buckley, Ed](mailto:Buckley, Ed); "[Jennifer Zambriczki](mailto:JenniferZambriczki@lucey-law.com)"; "[Sohayla Townes](mailto:SohaylaTownes@lucey-law.com)"  
**Subject:** RE: Palmetto Pointe POA v. WC Services (2019-001520) -- Final Brief and Reply Brief of Appellants and Certifications  
**Date:** Monday, October 19, 2020 5:50:02 PM  
**Attachments:** [image004.png](#)  
[App. Case No. 2019-001520 -- Palmetto Pointe v. WCS -- Final Brief of Appellants.pdf](#)  
[App. Case No. 2019-001520 -- Palmetto Pointe v. WCS -- Cert. for Final Brief of Appellants.pdf](#)  
[App. Case No. 2019-001520 -- Palmetto Pointe v. WCS -- Final Reply Brief of Appellants.pdf](#)  
[App. Case No. 2019-001520 -- Palmetto Pointe v. WCS -- Cert. for Final Reply Brief of Appellants.pdf](#)  
[image001.png](#)

---

Jim,

Please excuse the second email, but I forgot to update the subject line on the email I just sent you. So...once more for good measure, attached please find the **Final Brief of Appellants, Certification for Final Brief of Appellants, Final Reply Brief of Appellants**, and **Certification for Final Reply Brief of Appellants** in the above-referenced matter. These will be filed with the Court of Appeals via separate email.

Russell G. Hines  
YOUNG CLEMENT RIVERS, LLP  
[www.ycrlaw.com](http://www.ycrlaw.com)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
Phone: (843) 720-5488  
Fax: (843) 579-1327  
Email: [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)

**RECEIVED**  
**Oct 19 2020**  
**SC Court of Appeals**



---

**From:** Hines, Russell  
**Sent:** Monday, October 19, 2020 5:46 PM  
**To:** 'jatkins@clawsonandstaubes.com' <jatkins@clawsonandstaubes.com>  
**Cc:** 'Anna McCann' <amccann@lucey-law.com>; 'Justin Lucey' <jlucey@lucey-law.com>; Mixson, Kathryn <kmixson@ycrlaw.com>; 'Josh Evans' <jevans@lucey-law.com>; 'Lee Weiland' <lweiland@lucey-law.com>; DeMato, Amanda <ADemato@ycrlaw.com>; 'Stephanie Drawdy' <sdrawdy@lucey-law.com>; Justman, Aimee <AJustman@ycrlaw.com>; Bell, Pollyana (Polly) <pbell@ycrlaw.com>; Buckley, Ed <ebuckley@ycrlaw.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>; Sohayla Townes <stownes@lucey-law.com>  
**Subject:** RE: Palmetto Pointe POA v. WC Services (2019-001520) -- Initial Reply Brief of Appellants and Proof of Service

Attached please find the **Final Brief of Appellants, Certification for Final Brief of Appellants, Final Reply Brief of Appellants**, and **Certification for Final Reply Brief of Appellants** in the above-referenced matter. These will be filed with the Court of Appeals via separate email.

Russell G. Hines  
YOUNG CLEMENT RIVERS, LLP  
[www.ycrlaw.com](http://www.ycrlaw.com)  
25 Calhoun Street, Suite 400  
Charleston, South Carolina 29401  
P.O. Box 993 (29402)  
Phone: (843) 720-5488  
Fax: (843) 579-1327  
Email: [rhines@ycrlaw.com](mailto:rhines@ycrlaw.com)

