

**RECEIVED**

**Feb 19 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas  
The Honorable Jennifer B. McCoy, Circuit Court Judge

---

Case No. 2015-CP-10-00955  
Appellate Case No. 2019-001790

---

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

v.

Island Pointe, LLC; Complete Building Corporation; Tri-County Roofing, Inc.; Creekside, Inc.; American Residential Services, LLC d/b/a ARS/Rescue Rooter Charleston; Andersen Windows, Inc.; Atlantic Building Construction Services, Inc. n/k/a Atlantic Construction Services, Inc.; Builder Services Group, Inc. d/b/a Gale Contractor Services; Novus Architects, Inc. f/k/a SGM Architects, Inc.; Tallent and Sons, Inc.; WC Services, Inc., CRG Engineering, Inc.; CertainTeed Corporation; Kelly Flooring Products, Inc. d/b/a Carpet Baggers; Cornerstone Construction and Mark Malloy d/b/a Cornerstone Construction; Miracle Siding, LLC and Wilson Lucas Sales d/b/a Miracle LLC; Mark Palpoint a/ka Micah Palpoint; Elroy Alonzo Vasquez; Chris a/k/a John Doe 61; Alderman Construction; Stanley's Vinyl Fence Designs; Cohen's Drywall Company, Inc; Mosley Concrete; Hand A Framing Construction, LLC a/k/a H&A Framing Construction, LLC and d/b/a H and A Framing, LLC, H&A Construction, and Hand A Construction; JMC Construction, Inc.; JMC Construction, LLC; John Doe 1-15, Defendants,

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

and

Tri-County Roofing, Inc. is the Appellant.

---

**PROOF OF SERVICE**

---

I, Justin O'Toole Lucey, of Justin O'Toole Lucey, P.A., do hereby certify that on February 19, 2021, I served a copy of Respondents' Final Brief and Certificate of Compliance upon all parties by email and by copy thereof deposited in the U.S. Mail properly posted for delivery as follows:

Andrew N. Cole, Esq.  
Collins & Lacy, P.C.  
Post Office Box 12487  
Columbia, SC 29211  
acole@collinsandlacy.com

Respectfully submitted,

By:



Justin O'Toole Lucey (Bar No. 15438)  
Anna McCann (Bar No. 102314)  
415 Mill Street  
Mt. Pleasant, SC 29464  
Telephone: (843) 849-8400  
Facsimile: (843) 849-8406  
jlucey@lucey-law.com  
amccann@lucey-law.com

*-and-*

Edward D. Buckley, Jr., Esq.  
Young Clement Rivers, LLC  
P.O. Box 993  
Charleston, SC 29402  
(843) 724-5446  
[ebuckley@ycrlaw.com](mailto:ebuckley@ycrlaw.com)

*Attorneys for Respondents*

February 19, 2021  
Mt. Pleasant, South Carolina