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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
In The Supreme Court

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

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

Appellate Case No. 2020-001048

Patricia Damico and Lenna Lucas, Individually and on behalf of all others similarly situated, Joshua and Brettany Beutow, Edward and Sylvia Dengg, Jonathan and Theresa Douglass, Anthony and Stacey Ray, Danny and Ellen Davis Morrow, Czara and Chad England, Bryan and Cynthia Camara, and Matthew Collins, Respondents,

v.

Lennar Carolinas, LLC, Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super Concrete of SC, Inc., Southern Green, Inc. TJB Trucking/Leasing, LLC, Paragon Site Constructors, Inc., Civil Site Environmental and Rick Bryant, Individually, Defendants,

Of which Spring Grove Plantation Development, Inc., Manale Landscaping, LLC, Super Concrete of SC, Inc., Southern Green, Inc. TJB Trucking/Leasing, LLC, and Civil Site Environmental are Respondents.

And

Lennar Carolinas, LLC, Appellant,

v.

The Earthworks Group, Inc., Volkmar Consulting Services, LLC, Geometries Consulting, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., A.C.&A. Concrete, Inc., Knight's Concrete Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders Firstsource Southeast Group, LLC, and Low Country Renovations and Siding, LLP, Third-Party Defendants,

Of which Volkmar Consulting Services, LLC, Land/Site Services, Inc., Myers

Landscaping, Inc., A.C.&A. Concrete, Inc., Knight's Concrete Products, Inc., Knight's Redi-Mix, Inc., Coastal Concrete Southeast, LLC, Coastal Concrete Southeast II, LLC, Guaranteed Framing, LLC, Ozzy Construction, LLC, Construction Applicators Charleston, LLC, LA New Enterprises, LLC, Decor Corporation, DVS, Inc., Raul Martinez Masonry, LLC, Alpha Omega Construction Group, Inc., South Carolina Exteriors, LLC, Builders Firstsource Southeast Group, LLC, are also Respondents.

And

Decor Corporation, Fourth Party Plaintiff,

v.

Baranov Flooring, LLC, DJ Construction Services, LLC, Creative Wood Floors, LLC, Geraldo Cunha, Ebenezer Flooring, LLC, Emmanuel Flooring and Siding, LLC, Eusi Flooring and Covering, LLC, Nicolas Flores, Alexander Martinez, Isidini Mejia, Juan Perez, N&B Construction, LLC, Jose Dias Rodrigues, Livia Sousa, Jose Paz Castro Hernandez, Divinio Aperecido Corgosinho, Ricardo Chiche, CEBS Construction, Bayshore Siding and Flooring, Sebastio Luiz de Araujo, and John Does 1-4, Fourth Party Defendants,

Of whom Patricia Damico, Joshua and Brettany Beutow, Bryan and Cynthia Camara, Matthew Collins, Jonathan and Teresa Douglas, Czarra and Chad England, Lena Lucas, and Danny and Ellen Davis Morrow are the Petitioners.

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PROOF OF SERVICE

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I, the undersigned, certify that I have served the *Brief of Petitioners* and *Appendix* on behalf of Petitioners Patricia Damico, Joshua and Brettany Beutow, Bryan and Cynthia Camara, Matthew Collins, Jonathan and Teresa Douglass, Czarra and Chad England, Lenna Lucas, and Danny and Ellen Davis Morrow on all counsel of record by mailing and/or emailing them a copy at the addresses listed below, and have served all *Pro Se* parties with the same by U.S. Mail, on this 8<sup>th</sup> day of July, 2021. Pursuant to the May 20, 2020 Order of the South Carolina Supreme Court, as amended on May 29, 2020, a copy of the aforementioned email correspondence is attached.

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Respectfully submitted,


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s/Jesse Sanchez

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July 8, 2021  
Charleston, South Carolina

**From:** Jesse Sanchez jesse@jessesanchezlaw.com   
**Subject:** Re: Patricia Damico v. Lennar Carolinas - Case No. 2020-001048



**Date:** July 8, 2021 at 11:13 AM

**To:** Werner, James L. jimwerner@parkerpoe.com, McGee, Jenna K. jennamcgee@parkerpoe.com, Dawson, Jr., Katon E. katondawson@parkerpoe.com

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Counsel,

For service, please find the attached Cover Letter and Brief of Petitioners, and the below links to download the Appendix and associated Record on Appeal, all of which are being filed with the Supreme Court of South Carolina today.

 **2020-001048 Damico v Lennar - Appendix Final.pdf**

 **2020-001048 Damico v Lennar - Record on Appeal**

Regards,

Jesse

--

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July 8, 2021

**VIA HAND DELIVERY**

The Honorable Daniel E. Shearouse  
Clerk, Supreme Court of South Carolina  
1231 Gervais Street  
Columbia, SC 29201

**Re: Patricia Damico, et. al. v. Lennar Carolinas, LLC, et al.**



**Appellate Case No. 2020-001048**

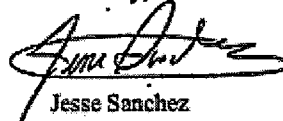
Dear Mr. Shearouse,

With regard to the above-referenced matter, enclosed, please find the following for filing with the Court:

1. Ten (10) bound copies and one (1) unbound copy of the *Brief of Petitioners*.
2. Ten (10) bound copies of the *Appendix*, including ten (10) bound copies of Volumes I-VI of the *Record on Appeal*. Please note that the *Record on Appeal* is being filed separately from the *Appendix* due to size.
3. One (1) unbound copy of the *Appendix* that does not include the *Record on Appeal*. There is an electronic copy of the *Record on Appeal* on file with the Court.
4. Proof of Service

Thank you for your attention to this matter. Should you have any questions regarding this submission, please do not hesitate to contact me directly at (843) 814-8181.

Sincerely,



Jesse Sanchez

Attorney for Petitioners Patricia Damico, Joshua and Brettany Beutow, Bryan and Cynthia Camara, Matthew Collins, Jonathan and Teresa Douglas, Czarra and Chad England, Lena Lucas, and Danny and Ellen Davis Morrow

Cc: All Counsel of Record (Via Email and/or Mail)  
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