

Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; and Kevin Ball are the Primary Appellants,

v.

East Bridge Lofts, LLC; Central 3, LLC; Creekstone Eastbridge, LLC; and Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; and Bay Club Homes, LLC; Third-Party Plaintiffs,

v.

Robert Wasson and Barbara Wasson, individually and d/b/a Wasson Electric Heating & Air; and Charleston Chimney Services, Inc., Third-Party Defendants.

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**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN PARTIES AND  
FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE PARTIES,  
WITH REQUEST FOR BRIEFING TO BE STAYED OR OTHERWISE HELD IN  
ABEYANCE PENDING ACTION ON PETITION**

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**RECEIVED**

MAY 02 2013

**SC Court of Appeals**

YOUNG CLEMENT RIVERS, LLP  
Edward D. Buckley, Jr.  
Russell G. Hines  
P.O. Box 993  
Charleston, SC 29402  
(843) 577-4000

*-and-*

JUSTIN O'TOOLE LUCEY, P.A.  
Justin O'Toole Lucey  
Joshua F. Evans  
P.O. Box 806  
Mount Pleasant, SC 29465  
(843) 849-8400

*Attorneys for Respondents John Zohlen,  
Mary Zohlen, Leslie Anne O'Neal, and  
Trivette C. Hatcher*

TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA COURT OF APPEALS

COME NOW the undersigned counsel for Respondents John Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher ("Respondents"), pursuant to Rule 264, SCACR, and any other applicable authority, and, upon the following grounds, respectfully petition this Honorable Court for an order substituting the undersigned as counsel for the below listed parties, and dismissing the same parties from the current appeal.

1. Currently, the following parties are identified as Secondary Appellants represented by John C. Hayes, IV, Esquire, Hayes Law Firm, LLC; I. Keith McCarty, Esquire, McCarty Law Firm, LLC; and Michael S. Seekings, Esquire, Leath, Bouch & Seekings, LLP (hereinafter these attorneys will be collectively referred to as the "Secondary Appellants' Counsel"): **Hayden Jeffords, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Brian Rasmussen, and Brian Kavanagh** (hereinafter these parties will be collectively referred to as the "Parties for Whom Counsel is to be Substituted").

2. As evidenced by the attached **Exhibit A**, which exhibit is incorporated herein by reference, each of the Parties for Whom Counsel is to be Substituted no longer wishes to be represented by the Secondary Appellants' Counsel and desires to be represented by the undersigned, whom these parties have authorized and directed to take any needed action on their behalf to both effectuate their desired substitution of counsel and to immediately and entirely dismiss and/or otherwise withdraw them from any further participation in this appeal.

WHEREFORE, on behalf of the Parties for Whom Counsel is to be Substituted, the undersigned now petition this Court for an order relieving the Secondary Appellants' Counsel as their counsel and substituting the undersigned as their counsel, and providing that these same parties are dismissed and/or otherwise withdrawn from their participation in this appeal. The Parties for Whom Counsel is to be Substituted also ask that their names be removed from the caption of this appeal.<sup>1</sup> And, the undersigned, on behalf of the Respondents, would ask that the briefing on this appeal (including the appeals taken by the Primary and Secondary Appellants) be stayed or otherwise held in abeyance pending the Court's action on this petition for substitution of counsel, because the Court's action on this petition will have a direct and material impact on whom the adverse parties to this appeal actually are.<sup>2 3</sup> Presently, the Respondents' initial briefs in response to the Primary and Secondary Appellants are due May 1, 2013. To the extent that the Court may not be inclined to hold this briefing deadline in abeyance on account of this petition, the Respondents include herein (along with an additional \$25 filing fee) a motion for a 30-day extension of the present May 1, 2013 briefing deadline (i.e., through May 31, 2013), which extension the Respondents contend is founded upon good cause under the

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<sup>1</sup>After substitution and dismissal, there would only be nine (9) remaining Secondary Appellants: Titus Gudel, Harold S. McEwan, William Scanlon, Delia Scanlon, Steven Goldberg, Brent McClaine, McKenzie Hutaff, Lynn Harris, and Kenneth A. Brown.

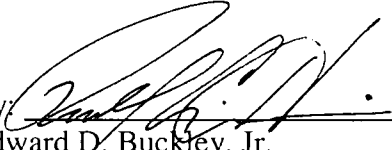
<sup>2</sup> By way of further support for this ancillary relief, the undersigned note that, by rule (Rule 240(b), SCACR), a motion to dismiss automatically stays the time for perfecting the appeal.

<sup>3</sup> Counsel recognize that Rule 240(c) provides that motions or petitions are to be filed with a supporting memorandum. In this instance, counsel believe that a full explanation of the petition is contained herein—particularly, in light of the effected parties' express consent and direction with regard to this petition—such that a separate memorandum would serve no useful purpose. Of course, to the extent that the Court does not agree with this assessment regarding the need for a separate supporting memorandum, counsel

circumstances and will work no undue prejudice upon any other party. Lastly, and in any event, the Respondents would ask that their present May 1, 2013 briefing deadline be suspended until the Court acts upon this filing.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:   
Edward D. Buckley, Jr.  
Russell G. Hines  
25 Calhoun Street, Suite 400  
Charleston, SC 29401  
(843) 577-4000

*-and-*

JUSTIN O'TOOLE LUCEY, P.A.  
Justin O'Toole Lucey  
Joshua F. Evans  
P.O. Box 806  
Mount Pleasant, SC 29465  
(843) 849-8400

*Attorneys for Respondents John Zohlen,  
Mary Zohlen, Leslie Anne O'Neal, and  
Trivette C. Hatcher*

Charleston, South Carolina

Dated: 4/30/13

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will gladly provide the Court with any other or further briefing/material as the Court may direct.

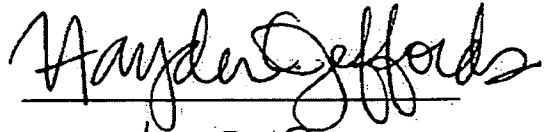
*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF HAYDEN JEFFORDS TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN  
PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE  
PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR  
OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, HAYDEN JEFFORDS, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

HAYDEN JEFFORDS



Dated: 4-25-13



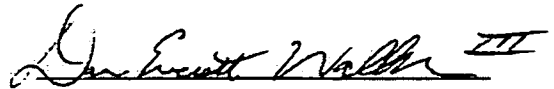
*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF D. EVERETT WALKER TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, D. EVERETT WALKER, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

D. EVERETT WALKER



Dated: 4-25-13

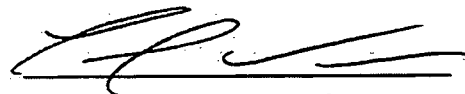
*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF PAUL KANE TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, PAUL KANE, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

PAUL KANE



Dated: 4/22/13

*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF JEANNE DEBOSH TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN  
PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE  
PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR  
OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, JEANNE DEBOSH, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

JEANNE DEBOSH

*Jeanne Debosh*

Dated: \_\_\_\_\_

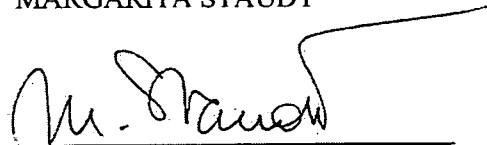
*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF MARGARITA STAUDT TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN  
PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE  
PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR  
OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, MARGARITA STAUDT, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

MARGARITA STAUDT

A handwritten signature in black ink, appearing to read "M. Staudt", is written over a horizontal line. A long, thin horizontal line extends to the right from the end of the signature.

Dated: 4.26.13

EXPRESS CONSENT OF CHRISTY C. PARISH TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, CHRISTY C. PARISH, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

CHRISTY C. PARISH

A handwritten signature in cursive script that reads "Christy C. Parish". The signature is written in black ink and is positioned above a horizontal line.

Dated: 4/22/2013

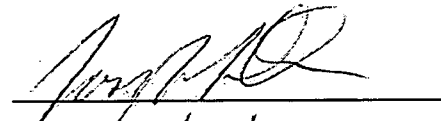
*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF JOSEPH LADUE TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN  
PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE  
PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR  
OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, JOSEPH LADUE, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

JOSEPH LADUE

  
Dated: 4/22/2013

*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF DEBORAH LADUE TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, DEBORAH LADUE, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

DEBORAH LADUE

*See attached - signed*

Dated: *consent will be forwarded upon receipt*

**Hines, Russell**

---

**From:** Josh Evans [jevans@lucy-law.com]  
**Sent:** Tuesday, April 30, 2013 3:08 PM  
**To:** Hines, Russell  
**Subject:** FW: East Bridge

**From:** [Ladue2000@aol.com](mailto:Ladue2000@aol.com) [mailto:[Ladue2000@aol.com](mailto:Ladue2000@aol.com)]  
**Sent:** Wednesday, March 13, 2013 1:31 PM  
**To:** [jevans@lucy-law.com](mailto:jevans@lucy-law.com)  
**Subject:** Re: East Bridge

yes please dismiss me from the Jeffords lawsuit and appeal.

thank you

Deborah La Due

In a message dated 3/13/2013 1:20:50 P.M. Eastern Daylight Time, [jevans@lucy-law.com](mailto:jevans@lucy-law.com) writes:

Deb

I received your Litigation Authorization form. Thank you. Please confirm by replying to this email that you wish to be removed from the now dismissed Jeffords lawsuit and appeal.

*Joshua F. Evans, Esquire*

Justin O'Toole Lucey, PA

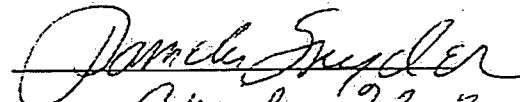
*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF PAMELA SNYDER TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN  
PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE  
PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR  
OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, PAMELA SNYDER, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

PAMELA SNYDER

  
Dated: April 22, 2013

*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*  
Circuit Case No. 2010-CP-10-9762  
Appellate Case No. 2012-213351

EXPRESS CONSENT OF BRIAN RASMUSSEN TO:

**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, BRIAN RASMUSSEN, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

BRIAN RASMUSSEN



Dated: 4/29/13

*Jeffords et al. v. East Bridge Town Lofts, LLC et al. v. Wasson et al.*

Circuit Case No. 2010-CP-10-9762

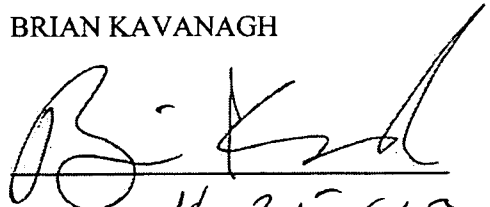
Appellate Case No. 2012-213351

EXPRESS CONSENT OF BRIAN KAVANAGH TO:

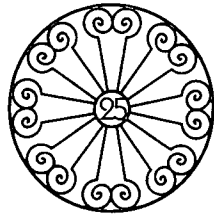
**PETITION FOR SUBSTITUTION OF COUNSEL FOR CERTAIN PARTIES AND FOR DISMISSAL AND/OR WITHDRAWAL OF THOSE PARTIES, WITH REQUEST FOR BRIEFING TO BE STAYED OR OTHERWISE HELD IN ABEYANCE PENDING ACTION ON PETITION**

I, BRIAN KAVANAGH, presently identified as a Plaintiff/Secondary Appellant in the above-referenced case/appeal, do hereby expressly consent to the above-referenced motion, substitution of counsel for me, and the termination of my participation in this appeal.

BRIAN KAVANAGH



Dated: 4-25-12



**YCR LAW**  
Young Clement Rivers, LLP

68201 4  
68202

Russell G. Hines  
Associate

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: RHines@ycrlaw.com

April 30, 2013

**VIA U.S. MAIL**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

MAY 08 2013

**SC Court of Appeals**

Re: Hayden Jeffords et al. vs. East Bridge Town Lofts et al.  
Circuit Case No.: 2010-CP-10-9672  
Appellate Case No.: 2012-213351  
YCR File No.: 14096-20090424

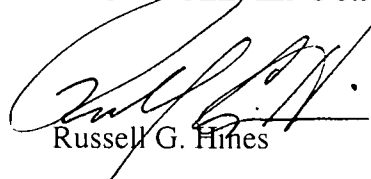
Dear Ms. Kitchings:

Enclosed for filing in the above-referenced matter please find the original and seven (7) copies of a **Petition for Substitution of Counsel for Certain Parties and for Dismissal and/or Withdrawal of those Parties, with Request for Briefing to be Stayed or otherwise Held in Abeyance Pending Action on Petition** along with a **Proof of Service** for the same. In light of the relief requested in this filing we are also enclosing two (2) checks, each in the amount of \$25, to the extent that an additional filing fee is needed. Please return a stamped copy of the main document and proof of service in the envelope provided. Of course, if you have any questions or concerns, please let me know.

With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/jla

cc: (all below via U.S. Mail)  
Justin O'Toole Lucey, Esquire, Justin O'Toole Lucey, P.A.  
Joshua F. Evans, Esquire, Justin O'Toole Lucey, P.A.  
Robert T. Lyles, Jr., Esquire, Lyles & Lyles, LLC  
Jason A. Pittman, Esquire, Lyles & Lyles, LLC  
John C. Hayes, IV, Esquire, Hayes Law Firm, LLC

The Honorable Jenny Abbott Kitchings

April 30, 2013

Page 2 of 2

Mary-Margaret S. Fitzhenry, Esquire, Hayes Law Firm, LLC  
I. Keith McCarty, Esquire, McCarty Law Firm, LLC  
Michael S. Seekings, Esquire, Leath Bouch & Seekings, LLP  
Preston B. Dawkins, Jr., Esquire, Aiken Bridges  
James A. Atkins, Esquire, Clawson & Staubes, LLC  
Christy E. Mahon, Esquire, Sweeny, Wingate & Barrow, P.A.  
J. Patrick Norris, Esquire, Carlock, Copeland & Stair, LLP  
William M. O'Neil, Esquire, Hood Law Firm, LLC  
J. Blanton O'Neal, Esquire, Hood Law Firm, LLC

W8241 + W8242

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

Case No. 2010-CP-10-9672

RECEIVED

MAY 02 2013

SC Court of Appeals

Hayden Jeffords, individually, and on behalf of All Others Similarly Situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, Leslie Anne O'Neal, Trivette C. Hatcher, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown, Plaintiffs,

Of Whom Hayden Jeffords, individually and on behalf of all others similarly situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown are the Secondary Appellants,

And

Of Whom John Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher are the Respondents.

v.

East Bridge Town Lofts, LLC a/k/a East Bridge, LLC a/k/a East Ridge Homes, LLC a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; East Coast Carpentry a/k/a ECC Contracting, LLC; Fuller Drywall & Paint, Ltd.; Delta Mechanical, Inc. a/k/a Carolina Delta Mechanical; Wasson Electric Heating & Air; Bay Club Homes, LLC; Terracon Consultants, Inc.; Salvador Rubalcaba d/b/a Rubalcaba Construction, Defendants,

Of Whom East Bridge Town Lofts, LLC a/k/a East Bridge, LLC a/k/a East Ridge Homes, LLC a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC;

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

Appeal from Charleston County  
Court of Common Pleas

Roger M. Young, Sr., Circuit Court Judge

RECEIVED

MAY 02 2013

SC Court of Appeals

Case No. 2010-CP-10-9672

Hayden Jeffords, individually, and on behalf of All Others Similarly Situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, Leslie Anne O'Neal, Trivette C. Hatcher, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown, Plaintiffs,

Of Whom Hayden Jeffords, individually and on behalf of all others similarly situated, Titus Gudel, Harold S. McEwan, D. Everett Walker, Paul Kane, Jeanne Debosh, Margarita Staudt, William Scanlon, Delia Scanlon, Christy C. Parish, Joseph LaDue, Deborah LaDue, Pamela Snyder, Steven Goldberg, Brent McClaine, Brian Rasmussen, McKenzie Hutaff, Brian Kavanagh, Lynn Harris, and Kenneth A. Brown are the Secondary Appellants,

And

Of Whom John Zohlen, Mary Zohlen, Leslie Anne O'Neal, and Trivette C. Hatcher are the Respondents.

v.

East Bridge Town Lofts, LLC a/k/a East Bridge, LLC a/k/a East Ridge Homes, LLC a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; East Coast Carpentry a/k/a ECC Contracting, LLC; Fuller Drywall & Paint, Ltd.; Delta Mechanical, Inc. a/k/a Carolina Delta Mechanical; Wasson Electric Heating & Air; Bay Club Homes, LLC; Terracon Consultants, Inc.; Salvador Rubalcaba d/b/a Rubalcaba Construction, Defendants,

Of Whom East Bridge Town Lofts, LLC a/k/a East Bridge, LLC a/k/a East Ridge Homes, LLC a/k/a East Bridge Lofts, LLC; Central 3, LLC; Creekstone East Bridge, LLC; Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC;

Creekstone Management, Inc.; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; and Kevin Ball are the Primary Appellants,

v.

East Bridge Lofts, LLC; Central 3, LLC; Creekstone Eastbridge, LLC; and Creekstone SC I, LLC; Alexandra Road Investors, LLC; Creekstone Management, LLC; Donald K. Henry; Everett Jackson; Steve Keller; Edward Michael Washburn; Kevin Ball; and Bay Club Homes, LLC; Third-Party Plaintiffs,

v.

Robert Wasson and Barbara Wasson, individually and d/b/a Wasson Electric Heating & Air; and Charleston Chimney Services, Inc., Third-Party Defendants.

---

**PROOF OF SERVICE**

---

YOUNG CLEMENT RIVERS, LLP  
Edward D. Buckley, Jr.  
Russell G. Hines  
P.O. Box 993  
Charleston, SC 29402  
(843) 577-4000

*-and-*

JUSTIN O'TOOLE LUCEY, P.A.  
Justin O'Toole Lucey  
Joshua F. Evans  
P.O. Box 806  
Mount Pleasant, SC 29465  
(843) 849-8400

*Attorneys for Respondents John Zohlen,  
Mary Zohlen, Leslie Anne O'Neal, and  
Trivette C. Hatcher*

I, Russell G. Hines, of Young Clement Rivers, LLP, do hereby certify that a copy of the Respondents' **Petition for Substitution of Counsel for Certain Parties and for Dismissal and/or Withdrawal of those Parties, with Request for Briefing to be Stayed or otherwise Held in Abeyance Pending Action on Petition** was sent to all counsel via united states mail, postage pre-paid on April 30, 2013 addressed as follows:

Justin Lucey, Esquire  
Joshua F. Evans, Esquire  
415 Mill Street  
Mount Pleasant, SC 29465  
Phone: (843) 849-8400

Robert T. Lyles, Esquire  
Jason A. Pittman, Esquire  
Lyles & Lyles, LLC  
342 East Bay Street  
Charleston, SC 29401

Christy E. Mahon, Esquire  
Sweeny, Wingate & Barrow, P.A.  
1515 Lady Street  
P.O. Box 12129  
Columbia, SC 29201

Kent T. Stair, Esquire  
Patrick Norris, Esquire  
Carlock, Copeland & Stair, LLP  
40 Calhoun Street, Suite 400  
Charleston, SC 29401

James A. Atkins, Esquire  
Clawson & Staubes, LLC  
126 Seven Farms Drive, Suite 200  
Charleston, SC 29492

J. Blanton O'Neal, Esquire  
William M. O'Neil, Esquire  
Hood Law Firm, LLC  
172 Meeting Street  
Charleston, SC 29401

Preston B. Dawkins, Jr., Esquire  
Aiken Bridges  
181 East Evans Street, Suite 409  
Florence, SC 29506

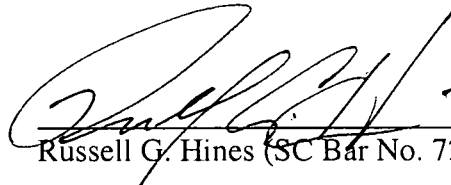
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