

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

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**RECEIVED**

**Mar 11 2022**

APPEAL FROM BERKELEY COUNTY  
COURT OF COMMON PLEAS  
THE HONORABLE J.C. NICHOLSON, JR.  
CIRCUIT COURT JUDGE

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S.C. SUPREME COURT

APPELLATE CASE NO. 2020-001048  
CIVIL ACTION NO. 2014-CP-08-2424

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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,**

versus

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 the

**RESPONDENTS.**

And

Lennar Carolinas, LLC,

**APPELLANT,**

versus

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 the

**RESPONDENTS.**

And

Decor Corporation,

**FOURTH-PARTY PLAINTIFF,**

versus

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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The undersigned hereby certifies that on March 11, 2022, he served the foregoing **Return to Petitioners' Petition to Lift Stay as to Discovery and Subcontractor Claims on behalf of Respondent Land/Site Services, Inc.** via email containing the above referenced document to all counsels' individual email addresses pursuant to the SC Supreme Court COVID Order 2020-05-29-02 as follows: 3 PPAB 6810397v1.docx

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**Cc:** John Rogers

**Subject:** Patricia Damico v. Lennar Carolinas, et al.

**Attachments:** Land Site's Return to Petitioners' Petition to Lift Stay as to Disc and Subcontractor  
Claims.pdf; Certificate of Counsel.pdf

All,

Please see attached Return to Petitioner's Petition to Lift Stay as to Discovery & Subcontractor Claims on behalf of Respondent, Land/Site Services, Inc. and Certificate of Counsel being filed with the SC Supreme Court today.

Kirby P. Parham  
Paralegal to John E. Rogers, II  
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In light of the April 3, 2020 Order of the South Carolina Supreme Court (Order 2020-04-03-01), we will be serving discovery and motions via email only.

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