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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

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

Appellate Case No. 2021-001050
Common Pleas Case No. 2016-CP-10-03783

The Retreat at Charleston National Country Club Home Owners Association, Inc. and The
Retreat at Charleston National Country Club Horizontal Property Regime Plaintiffs,

v.

Winston Carlyle Charleston National, LLC; Colin R. Campbell Construction, Inc.; Colin
Campbell, Individually; C.R. Campbell Construction Co., Inc.; Colin Campbell Construction,
LLC; Builders FirstSource-Southeast Group, LLC; Builders FirstSource, Inc.; Americo Roofing
Concepts, Inc.; DVS, Inc.; Advanced Building Connection, LLC; Guy C. Lee Building Materials,
LLC; WS Contractors, LLC; Dino Schwartz, Individually; ECC Contracting, LLC; Hurley
Services, LLC; McDaniel Construction Co., LLC; AC Construction Corp.; AC Construction, Inc.;
L&G Construction Group, LLC; Liollo Architecture; JC Construction d/b/a JC Construction, LLC
a/k/a JC Contractors a/k/a JC Contractors, LLC; Soto & Vasquez Construction, LLC a/k/a Costa
De Oliveira Construction, LLC a/k/a Costa De Oliveira Construction, LLC; Solesmar Jesus De
Oliveira; Wilson Lucas Sales d/b/a Miracle Siding; Miracle Siding, LLC; Royal Homes of SC,
Inc.; Colleen Batissa; Christopher Batissa; Norma Ferreira Bruno; Mendez Construction, LLC;
Juan Garza Ramos; Juan Garza Ramos d/b/a Juan Constructors; Jessica Marroquin; Jessica
Marroquin d/b/a Marroquin Construction; Carlos Marroquin; Carlos Marroquin and Jessica
Marroquin d/b/a Marroquin Construction; Feliciano Cruz Silva Garcia Roofing, LLC; Givair De
Caris; and Mario Salgado..... Defendants,

Builders FirstSource-Southeast Group, LLC Third-Party Plaintiff, Appellant,

v.

Pohlman Quality Contractors; Pohlman Quality Exteriors; Palmetto Trim and Renovation; Edward
Bruce Witham; and East Coast Carpentry Third-Party Defendants,

Of which Palmetto Trim and Renovation; Hurley Services, LLC; ECC Contracting, LLC; East Coast Carpentry; AC Construction, Inc.; WS Contractors, LLC; Pohlman Quality Exteriors, Inc.; and L&G Construction Group, LLC are the Respondents

RESPONDENT PALMETTO TRIM AND RENOVATION'S DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL

In addition to the matter designated by Appellant and other Respondents, Respondent Palmetto Trim and Renovation proposes the following to be included in the Record on Appeal:

1. Palmetto Trim's Amended Motion for Summary Judgment dated 10/22/20.
2. Circuit court order dated 7/26/21.
3. Form 4 order granting Partial Summary Judgment in favor of Palmetto Trim and Renovation, LLC, entered 5/10/21.
4. Palmetto Trim's Amended Motion for Summary Judgment Adopting the Positions of East Coast Positions
5. Plaintiffs' Complaint
6. Plaintiffs' Amended Complaints
7. BFS' Amended Answer, Crossclaims and Third-Party Complaint
8. Palmetto Trim's Answer to BFS's Crossclaims

I certify that his designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

RICHARDSON PLOWDEN & ROBINSON,

P.A.

s/ Payton D. Hoover

James H. Elliott, Jr., (SC Bar No. 13620)
Payton D. Hoover (SC Bar No. 75967)
235 Magrath Darby Blvd., Ste. 100
Mt. Pleasant, SC 29464
Tele: 843-805-6550 / Fax: 843-805-6599

jelliott@richardsonplowden.com
phoover@richardsonplowden.com

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Mount Pleasant, South Carolina

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Of which Palmetto Trim and Renovation; Hurley Services, LLC; ECC Contracting, LLC; East Coast Carpentry; AC Construction, Inc.; WS Contractors, LLC; Pohlman Quality Exteriors, Inc.; and L&G Construction Group, LLC are the Respondents

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that he has served the foregoing “**INITIAL BRIEF OF RESPONDENT OF PALMETTO TRIM AND RENOVATIONS AND DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**” upon all counsel of record via electronic mail only to counsels’ last known email address on this 29th day of April, 2022.

Respectfully submitted,

RICHARDSON PLOWDEN & ROBINSON,

P.A.

s/ Payton D. Hoover

James H. Elliott, Jr., (SC Bar No. 13620)

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