

THE STATE OF SOUTH CAROLINA  
In Supreme Court

**RECEIVED**

**May 11 2022**

APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

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

Appellate Case No. 2020-001048

Case No. 2014-CP-08-02424

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, Inc. and Rick Bryant, ..... Defendants,

Of which 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 are..... Respondents.

And

Lennar Carolinas, LLC is.....Appellant.

v.

The Earthworkers Group, Inc., Volkmar Consulting Services, LLC, Geometrics 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, Décor 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 A.C. & A. Concrete, Inc., Alpha Omega Construction Group, Inc., Builders FirstSource-Southeast Group, LLC, Coastal Concrete of Southeast, LLC, Coastal Concrete of Southeast II, LLC, Construction Applicators of Charleston, LLC, Décor Corporation, DVS, Inc., Guaranteed

Framing, LLC, Knight’s Concrete Products, Inc., Knight’s Redi-Mix, Inc., LA New Enterprises, LLC, Land/Site Services, Inc., Myers Landscaping, Inc., Ozzy Construction, LLC, Raul Martinez Masonry, LLC, South Carolina Exteriors, LLC, and Volkmar Consulting Services, LLC are .....Respondents.

And

Décor Corporation, ..... Respondents.

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, Isidru 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, Sabastio Liuz De Araujo, and John Doe 1-4,.....Fourth-Party Defendants.

Of whom

Patricia Damico, Joshua and Brettany Beutow, Bryan and Cynthia Camara, and 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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**SUBSTITUTION OF COUNSEL PER RULE 264(b)**

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YOU WILL PLEASE TAKE NOTICE that pursuant to Rule 264 (b), SCACR, Michael E. Wright, Esq. of Robertson Hollingsworth Manos & Rahn, LLC (“RHMR”) is seeking to withdraw as counsel for Respondent Super Concrete of SC, Inc. (“Super Concrete”) and to have his partner, Theodore L. Manos, Esq., of RHMR substitute as counsel. Proper notice has been provided to the client and adverse party without objection. RHMR hereby petitions the Court to Substitute Theodore L. Manos, Esquire of RHMR for Michael E. Wright as the attorney of record. By this notice, Super Concrete requests that The South Carolina Appellate Case Management System revise its records to identify Mr. Manos as counsel for Super Concrete and to remove Michael E. Wright.

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By: /s/ Theodore L. Manos  
Theodore L. Manos (SC Bar No. 8660)  
**Attorneys for Super Concrete of SC, Inc.**

Charleston, South Carolina

May 11, 2022