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May 11 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas,

Clifton Newman, Circuit Court Judge

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Case No. 2022-CP-10-00126

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Ann and James Cavanaugh,  
Kiawah Development Partners,  
LLC, Knight Residential Group  
Charleston, LLC, H&J Services,  
LLC, Pro Roofers, Inc.,  
Professional Roofers, Inc., Pro  
Roofing Company, and  
Construction Applicators  
Charleston, LLC,

Respondents,

v.

Privilege Underwriters Reciprocal  
Exchange,

Appellant.

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NOTICE OF APPEAL

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Privilege Underwriters Reciprocal Exchange appeals the order of the Honorable Clifton Newman dated April 12, 2022. Appellant received written notice of entry of this order on April 12, 2022.

May 11, 2022.

*/s/ R. Taylor Speer*

---

R. Taylor Speer  
SC Bar No. 100455  
FOX ROTHSCHILD LLP  
2 W. Washington Street  
Suite 1100  
Greenville, South Carolina 29601  
*Attorney for Appellant*

Other Counsel of Record:

Benjamin A.C. Traywick  
Alexandra Scott Williams  
171 Church Street, Suite 340  
Charleston, SC 29401  
*Attorneys for Plaintiffs*

Catherine Holland Chase  
Stephen Augustus Griffith, Jr.  
PO Box 993  
Charleston, SC 29402  
*Attorneys for Defendant H&J Services, LLC*

Beth Manning Lee  
Lewis Gregory Cook Horton  
PO Box 999  
Charleston, SC 29402  
*Attorneys for Defendant Knight Residential Group Charleston, LLC*

Donald J. Davis, Jr.  
Kara S. Grevey  
25 Calhoun Street, Suite 400  
Charleston, SC 29401  
*Attorneys for Defendant Kiawah Development Partners, LLC*

Christopher H. Pearce  
1314 Professional Drive  
Myrtle Beach, SC 29577  
*Attorney for Defendant Construction Applicators Charleston, LLC*

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Roofing Company, and  
Construction Applicators  
Charleston, LLC,

Respondents,

v.

Privilege Underwriters Reciprocal  
Exchange,

Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Ann and James Cavanaugh via email and by depositing a copy of it in the United States Mail, postage prepaid, on May 10, 2022, addressed to their attorneys of record, Benjamin A.C. Traywick and Alexandra Scott Williams, 171 Church Street, Suite 340, Charleston, SC 29401.

May 11, 2022.

/s/ R. Taylor Speer

R. Taylor Speer  
SC Bar No. 100455  
FOX ROTHSCHILD LLP  
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*Attorney for Appellant*

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v.

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Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on Construction Applicators Charleston, LLC via email and by depositing a copy of it in the United States Mail, postage prepaid, on May 10, 2022, addressed to their attorney of record, Christopher H. Pearce, 1314 Professional Drive, Myrtle Beach, South Carolina 29577.

May 11, 2022.

/s/ R. Taylor Speer  
R. Taylor Speer  
SC Bar No. 100455  
FOX ROTHSCHILD LLP  
2 W. Washington Street  
Suite 1100  
Greenville, South Carolina 29601  
*Attorney for Appellant*

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Professional Roofers, Inc., Pro  
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Construction Applicators  
Charleston, LLC,

Respondents,

v.

Privilege Underwriters Reciprocal  
Exchange,

Appellant.

PROOF OF SERVICE

I certify that I have served the Notice of Appeal on H&J Services, LLC via email and by depositing a copy of it in the United States Mail, postage prepaid, on May 10, 2022, addressed to their attorneys of record, Catherine Holland Chase and Stephen Augustus Griffith, Jr., P.O. Box 993, Charleston, South Carolina 29402.

May 11, 2022.

/s/ R. Taylor Speer  
R. Taylor Speer  
SC Bar No. 100455  
FOX ROTHSCHILD LLP  
2 W. Washington Street  
Suite 1100  
Greenville, South Carolina 29601  
*Attorney for Appellant*

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Case No. 2022-CP-10-00126

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Charleston, LLC,

Respondents,

v.

Privilege Underwriters Reciprocal  
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Appellant.

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PROOF OF SERVICE

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I certify that I have served the Notice of Appeal on Kiawah Development Partners, LLC via email and by depositing a copy of it in the United States Mail, postage prepaid, on May 10, 2022, addressed to their attorneys of record, Donald J. Davis, Jr. and Kara S. Grevey, 25 Calhoun Street, Suite 400, South Carolina 29401.

May 11, 2022.

/s/ R. Taylor Speer  
R. Taylor Speer  
SC Bar No. 100455  
FOX ROTHSCHILD LLP  
2 W. Washington Street  
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Ann and James Cavanaugh,  
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LLC, Pro Roofers, Inc.,  
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Construction Applicators  
Charleston, LLC,

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v.

Privilege Underwriters Reciprocal  
Exchange,

Appellant.

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PROOF OF SERVICE

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I certify that I have served the Notice of Appeal on Knight Residential Group Charleston, LLC via email and by depositing a copy of it in the United States Mail, postage prepaid, on May 10, 2022, addressed to their attorneys of record, Beth Manning Lee and Lewis Gregory Cook Horton, PO Box 999, Charleston, SC 29402.

May 11, 2022.

/s/ R. Taylor Speer  
R. Taylor Speer  
SC Bar No. 100455  
FOX ROTHSCHILD LLP  
2 W. Washington Street  
Suite 1100  
Greenville, South Carolina 29601  
*Attorney for Appellant*

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LLC, Pro Roofers, Inc.,  
Professional Roofers, Inc., Pro  
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Construction Applicators  
Charleston, LLC,

Respondents,

v.

Privilege Underwriters Reciprocal  
Exchange,

Appellant.

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PROOF OF SERVICE

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I certify that I have served the Notice of Appeal on Professional Roofers, LLC by depositing a copy of it in the United States Mail, postage prepaid, on May 10, 2022, addressed to its registered agent, Ana M. Rodriguez, 52 Persimmon Street, Suite F, Bluffton, South Carolina 29910.

May 11, 2022.

/s/ R. Taylor Speer  
R. Taylor Speer  
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FOX ROTHSCHILD LLP  
2 W. Washington Street  
Suite 1100  
Greenville, South Carolina 29601  
*Attorney for Appellant*

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SC Court of Appeals



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May 11, 2022

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Ann and James Cavanaugh, Kiawah Development Partners, LLC, Knight Residential Group Charleston, LLC, H&J Services, LLC, Pro Roofers Inc., Professional Roofers, Inc., Pro Roofing Company, and Construction Applicators Charleston, LLC, Respondents, v. Privilege Underwriters Reciprocal Exchange, Appellant, Case No. 2022-CP-10-00126.

Dear Ms. Kitchings:

Enclosed for filing is a Notice of Appeal in the above case. Also enclosed are the following:

- (1) Proof of service of the Notice of Appeal on the respondents.
- (2) A copy of the Order which is to be challenged on appeal.
- (3) A filing fee of \$250.

Sincerely,

/s/ R. Taylor Speer

R. Taylor Speer  
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2 W. Washington Street, Suite 1100  
Greenville, South Carolina 29601  
[tspeer@foxrothschild.com](mailto:tspeer@foxrothschild.com)  
Attorney for Appellant

A Pennsylvania Limited Liability Partnership

California Colorado Delaware District of Columbia Florida Georgia Illinois Minnesota Missouri Nevada  
New Jersey New York North Carolina Oklahoma Pennsylvania South Carolina Texas Washington



Fox Rothschild <sup>LLP</sup>  
ATTORNEYS AT LAW

CC:

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171 Church Street, Suite 340  
Charleston, SC 29401  
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Catherine Holland Chase  
Stephen Augustus Griffith, Jr.  
PO Box 993  
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*Attorneys for Defendant H&J Services, LLC*

Beth Manning Lee  
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*Attorneys for Defendant Kiawah Development Partners, LLC*

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*Attorney for Defendant Construction Applicators Charleston, LLC*