STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS) FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON) CASE NO.: 2018-CP-10-4379
HOLY CITY EXTERIORS, LLC,	2019 BY
Plaintiff, vs.	REPLY TO CONTRACT EXTERIORS, LLC'S AND CONTRACT EXTERIORS OF
PATRICK STEWART, CONTRACT EXTERIOR, LLC AND CONTRACT EXTERIORS OF CHARLESTON, LLC,	CHARLESTON, LLC'S ANSWER
Defendants.	35 28

The Plaintiff above-named, by and through their undersigned attorney, hereby replies to Contract Exteriors, LLC and Contract Exteriors of Charleston, LLC's Answer as follows:

- 1. Each and every allegation not hereinafter specifically admitted, qualified or explained, is denied.
- 2. Paragraphs 1 through 61 do not require any response. To the extent a response may be deemed necessary, Plaintiff would deny the allegations contained therein and demand strict proof thereof.

WHEREFORE, having fully replied to Defendants' Answer and Counterclaim, your Plaintiffs pray as follows:

- a. That the Defendants' Answer and Counterclaim be dismissed with fees and costs assessed against Defendants Contract Exteriors, LLC and Contract Exteriors of Charleston, LLC in favor of the Plaintiff;
- b. That the relief requested in Plaintiff's Complaint be granted; and
- c. For such other and further relief on behalf of the Plaintiff as this Court deems just and proper.

HART HYLAND SHEPHERD, LLC

By:

Gregory L. Hyland, Esquire 207 East 1ST North Street (29483) Post Office Box 130 Summerville, SC 29484 (843) 410-0711 greg@hartfirm.com

Attorney(s) for Plaintiff

Dated: Filor van 6, 2018 Summerville, South Carolina



February 6, 2019

Via U.S. Mail

Charleston County Clerk of Court 100 Broad Street Charleston, SC 29401

RE:

Holy City Exteriors, LLC v. Contract Exteriors, LLC, et al.

Case No.: 2018-CP-10-4379

Dear Sir/Madame:

Enclosed for filing please find an original and four (4) copies of Plaintiffs' **Reply** to the Answer and Counterclaims of Defendants Contract Exteriors, LLC and Contract Exteriors of Charleston, LLC, and Patrick Staves.

I would appreciate it if you would kindly return file-stamped copies to me using the enclosed postage-paid self-addressed envelope.

Thanks again for your assistance.

Should you have any questions or concerns, please feel free to call my office at the 843-410-0711.

With kind regards, I remain

Yours truly,

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Gregory L. Hyland

Enclosure(s): as stated

cc:	Marybeth Mullaney	Michael Leech	
	1037-D Chuck Dawley Blvd. Suite 104	126 Seven Farms Dr., Ste. 200	
	Mount Pleasant, SC 29464	Charleston, SC 29492	