

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF CHARLESTON	)	CASE NO. 2019-CP-10-1592
	)	
JOHN M. GERACI AND ANGELA M. GERACI,	)	
	)	
	)	
Plaintiffs,	)	
	)	
v.	)	<b>DEFENDANTS TIMOTHY ZOLLO</b>
	)	<b>D/B/A ZOLLO CONSTRUCTION AND</b>
	)	<b>ZOLLO CONSTRUCTION</b>
TIMOTHY ZOLLO D/B/A ZOLLO	)	<b>INCORPORATED D/B/A ZOLLO</b>
CONSTRUCTION, ZOLLO	)	<b>CONSTRUCTION'S MOTION TO</b>
CONSTRUCTION INCORPORATED	)	<b>COMPEL DEFENDANT PATRIOT</b>
D/B/A ZOLLO CONSTRUCTION, A.	)	<b>DRYWALL, LLC TO ANSWER</b>
RAMOS BRICK & BLOCK, LLC D/B/A	)	<b>DISCOVERY</b>
A. RAMOS BRICK, BLOCK &	)	
PAINTING, LLC, REA LANDSCAPE	)	
MANAGEMENT, LLC, GOOD	)	
CONSTRUCTION, LLC, DON ROSS,	)	
LLC D/B/A DON ROSS ROOFING,	)	
SOURCE CONSULTING, LLC,	)	
QUAKER WINDOW PRODUCTS CO.	)	
D/B/A QUAKER WINDOWS & DOORS,	)	
CRYSTAL CLEAR POOLS OF	)	
CHARLESTON, LLC, FITZSIMMONS	)	
GUTTER, LLC, ALLIANCE	)	
MECHANICAL, LLC, BERT FLOYD	)	
D/B/A ROYAL FLUSH PLUMBING,	)	
CAMPBELL PLUMBING, INC., AND	)	
FLOORING FACTORY, LLC, PATRIOT	)	
DRYWALL, INC., AND DURHAM	)	
HOME SYSTEMS, LLC,	)	
	)	
Defendants.	)	
	)	

PLEASE TAKE NOTICE that Defendants Timothy Zollo d/b/a Zollo Construction and Zollo Construction Incorporated d/b/a Zollo Construction ("Zollo"), by their undersigned attorneys, will move before the Presiding Judge of the Ninth Judicial Circuit, Charleston County Courthouse, South Carolina, on the tenth day after service hereof or as soon thereafter as counsel may be heard, at such place and time as the court may appoint, for an Order pursuant to Rule

37(a), S. C. R. C. P., compelling Defendant Patriot Drywall, LLC (“Patriot”) to fully and completely respond to Zollo’s Interrogatories [Exhibit 1] and Zollo’s Requests for Production to Patriot [Exhibit 2], previously served on or about August 30, 2019, on the ground that Patriot has failed to respond in any way to the discovery. Additionally, Zollo requests an award of the reasonable expenses, including attorney’s fees, associated with the filing of this Motion in accordance with Rule 37(a)(4), S.C.R.C.P.

The undersigned hereby certifies and affirms in accordance with Rule 11 of the South Carolina Rules of Civil Procedure that prior to filing the instant motion she attempted to consult with opposing counsel and attempted in good faith to resolve the matter contained in said motion to no avail.

PLEASE BE PRESENT TO DEFEND IF SO MINDED.

KERNODLE COLEMAN

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ATTORNEY FOR TIMOTHY ZOLLO D/B/A  
ZOLLO CONSTRUCTION and ZOLLO  
CONSTRUCTION INCORPORATED D/B/A  
ZOLLO CONSTRUCTION

November 20, 2019

Charleston, South Carolina