

RECEIVED

Oct 23 2023

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Joan H. Toal
Acting Circuit Court Judge

Appellate Case No. 2023-000727

Lenora Childers, Individually and as Personal Representative of the
Estate of Lewis C. Childers, Plaintiff,

v.

Davis Mechanical Contractors, Inc.; Flame Refractories, Inc.;
General Boiler Casing Company, Inc.; HEFCO, Inc.; J.R. Dean
Company, Inc.; Payne & Keller Company; SFB, Incorporated;
Stafford Insulation Company; Standard Insulation Company of
N.C., Inc.; Systra Engineering, Inc.; United Construction Co. of
Rome, Inc.; Wind Up, Ltd., Individually and as Successor-in-
Interest to Pipe & Boiler Insulation, Inc. f/k/a Carolina Industrial
Insulating Co., Defendants,

Flame Refractories, Inc., United Construction Co. of Rome, Inc.,
Wind Up, Ltd., Individually and as Successor-in-Interest to Pipe &
Boiler Insulation, Inc. f/k/a Carolina Industrial Insulating Co.,
Payne & Keller Company, and PBI QSF, LLC, By and Through
Their Duly Appointed Receiver Peter D. Protopapas, Third-Party
Plaintiffs,

v.

Zurich American Insurance Company (Individually and as
Successor to Northern Insurance Company of New York, Maryland
American General Insurance Company, and Maryland Casualty
Company); Allstate Insurance Company; John Tighe; Sean
Anthony Beatty; Dennis William Cahill; Catherine Ann Carlino;
Andre Lefebvre; David Dean Shumway; Gil Chandler, Michael
Davenport; Linda Young Pettigrew; Gwyn Wallace Fuller; Daniel
Robert Keddie; Julie Ann Fortune; Michael John Crall; James
Francis Meehan; Larry Gene Simmons; Arrowpoint Group, Inc.;
Arrowpoint Capital Corp.; Admiral Insurance Company;
Continental Insurance Company (Individually and as Successor in
interest to Harbor Insurance Company); Hartford Accident and

Indemnity Company, Travelers Casualty & Surety Company f/k/a Aetna Casualty & Surety Company, National Union Fire Insurance Company of Pittsburgh, PA, Medmarc Casualty Insurance Company, Individually and as Successor in Interest to Dependable Insurance Company, Inc., Berkshire Hathaway Specialty Insurance Company f/k/a Stonewall Insurance Company, Individually and as Successor in interest to Stonewall Surplus Lines Insurance Company, Lexington Insurance Company, First State Insurance Company, Birmingham Fire Insurance Company, Certain Underwriters at Lloyd’s of London and various London Market Companies, South Carolina Property and Casualty Insurance Guaranty Association, R.L. Jarrett (Underwriting) Agency, Inc., U.S. Risk, L.L.C., Rexel USA, Inc., Compass Risk Services, LLC, SKRLA, LLC, Century Indemnity Company, in its own capacity and as successor to CCI Insurance Company, as successor to Insurance Company of North America, United States Fire Insurance Company, and Fireman’s Fund Insurance Company,

Third-Party Defendants,

of which

Payne & Keller Company, by and through its Receiver Peter D. Protopapas, is the

Respondent,

and

AIG Property Casualty Company, formerly known as Birmingham Fire Insurance Company; Lexington Insurance Company; National Union Fire Insurance Company f/k/a Stonewall Insurance Company, individually and as successor in interest to Stonewall Surplus Lines Insurance Company; Continental Insurance Company, individually and as successor in interest to Harbor Insurance Company; and Travelers Casualty & Surety Company f/k/a Aetna Casualty & Surety Company are the

Appellants.

APPELLANTS’ MOTION TO STAY BRIEFING DEADLINES BECAUSE OF PENDING MOTION

While this appeal has been pending, the circuit court has entered an order that unquestionably impacts issues that are presently before this Court and, as a matter of law, are within this Court’s “exclusive jurisdiction.” Rule 205, SCACR. Accordingly, Appellants have

filed a motion to enforce Rule 205 and have this Court step in and enforce its own rules and its own jurisdiction.

Because there is presently an order issued by the circuit court that disrupts the pending appeal and the issues that are before the Court, Appellants respectfully move for an order suspending the current briefing deadlines until the Court has an opportunity to rule on Appellants' motion to enforce Rule 205 and vacate the intervening order below. Doing so would allow this appeal to continue without further interference so that this Court can properly review the actual issues presented in this appeal when they are fixed in place, rather than force Appellants and this Court to address a changing target that could be further disrupted if the circuit court is allowed to continue penetrating this Court's "exclusive jurisdiction."

The current deadline for Appellants to file their opening briefs and designation of matter is October 25, 2023. That deadline was extended once previously, and on October 20, 2023, Appellants filed a motion for a second 30-day extension. The circuit court entered an order violating Rule 205 on October 5, 2023, thus necessitating this motion and Appellants' accompanying Emergency Motion to Clarify and Enforce Rule 205.

Accordingly, for the reasons explained above and in further detail in Appellants' Emergency Motion to Clarify and Enforce Rule 205, Appellants respectfully request that this Court issue an order holding the current merits briefing deadlines in abeyance pending resolution of Appellants' Emergency Motion to Clarify and Enforce Rule 205.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

By: /s/ M. Todd Carroll
S.C. Bar No. 74000
todd.carroll@wbd-us.com
M. Elizabeth O'Neill
S.C. Bar No. 104013
elizabeth.oneill@wbd-us.com
1221 Main Street, Suite 1600
Columbia, SC 29201
(803) 454-6504

STEPTOE & JOHNSON LLP

Harry Lee
Pro Hac Vice
hlee@steptoe.com
1330 Connecticut Avenue, NW
Washington, DC 20036
(202) 429-8112

Attorneys for Appellant Travelers Casualty and
Surety Company

MURPHY & GRANTLAND, P.A.

By: /s/ Wesley B. Sawyer
S.C. Bar No. 100229
wsawyer@murphygrantland.com
4406-B Forest Drive (29206)
P.O. Box 6648
Columbia, SC 29260
(803) 782-4100

Attorneys for Appellants AIG Property Casualty
Company, formerly known as Birmingham Fire
Insurance Company; National Union Fire Insurance
Company of Pittsburgh, PA; Berkshire Hathaway
Specialty Insurance Company, formerly known as
Stonewall Insurance Company; and The Continental
Insurance Company, individually and as successor
in interest to Harbor Insurance Company

October 23, 2023

RECEIVED

Oct 23 2023

SC Court of Appeals

PROOF OF SERVICE

I, the undersigned of the law offices of Womble Bond Dickinson (US) LLP, attorneys for Appellant, do hereby certify that I have served all parties to this appeal with a copy of the pleading(s) specific below by emailing them at the addresses below:

Pleading(s): Appellants' Motion to Stay Briefing Deadlines Because of Pending Motion

Parties Served:

Peter D. Protopapas (pdp@rplegalgroup.com)
Brian M. Barnwell (bb@rplegalgroup.com)
John B. White, Jr. (jwhite@johnbwhitelaw.com)
Marghretta H. Shisko (mshisko@johnbwhitelaw.com)
Christopher Jones (cjones@johnbwhitelaw.com)
Griffin Littlejohn Lynch (glynch@johnbwhitelaw.com)
Scott Shutte (scott.schutte@morganlewis.com)
Brady Edwards (brady.edwards@morganlewis.com)

Counsel for Respondent Payne & Keller Corp., through its Receiver Peter D. Protopapas

By: /s/ M. Todd Carroll

October 23, 2023

From: [Carroll, Todd](#)
To: [Peter Protopapas](#); [Kevin K. Bell](#); ["JToal@sccourts.org"](#); ["Diaz, Eva"](#)
Cc: [Nicole Rice](#); [Diane Black](#); [Wesley B. Sawyer](#); ["mark.phillips@nelsonmullins.com"](#); ["James.Burns@nelsonmullins.com"](#); ["matt.patterson@nelsonmullins.com"](#); ["kelli.martin@nelsonmullins.com"](#); ["hollyparker@piercesloan.com"](#); ["VISTRA-GRSMTeam@grsm.com"](#); ["Oelhamzaoui@mgsattorneys.com"](#); ["acraig@windelsmarx.com"](#); ["Ainsley.tillman@fordwallace.com"](#); ["alegary@grsm.com"](#); ["AMelling@burr.com"](#); ["Angela.strickland@bowmanandbrooke.com"](#); ["arolain@ruggierilaw.com"](#); ["Asbestos@elliswinters.com"](#); ["ashley.brathwaite@elliswinters.com"](#); ["Ashley.Lord@bowmanandbrooke.com"](#); ["AShuler@burr.com"](#); ["bduffy@duffyandyoung.com"](#); [Benjamin Limbaugh](#); ["bensmoot@piercesloan.com"](#); ["bjowers@nexsenpruet.com"](#); ["bnes@morganlewis.com"](#); [Edwards, Brady](#); ["byntema@goldbergsegalla.com"](#); ["caseyhewitt@piercesloan.com"](#); ["cem@swblaw.com"](#); [Chris Jones](#); ["cmastrianni@lawhssm.com"](#); ["CShytle@mcquirewoods.com"](#); ["cstegmaier@collinsandlacy.com"](#); [Danny Nieto](#); ["dargobright@mcquirewoods.com"](#); ["deshawn.mitchell@bowmanandbrooke.com"](#); ["dharris@goldbergsegalla.com"](#); ["drew.marocco@dentons.com"](#); ["dwalulik@fbtlaw.com"](#); ["ejones@gwblawfirm.com"](#); [O'Neill, Elizabeth](#); ["elizabeth.taylor@piercesloan.com"](#); ["EMoultrie@kassellaw.com"](#); ["eparks@ruggierilaw.com"](#); ["erik@hmp-law.com"](#); ["Glee.Henderson@bowmanandbrooke.com"](#); [Griffin Lynch](#); ["jmgforan@duanemorris.com"](#); ["hlee@steptoe.com"](#); ["hmcmaster@collinsandlacy.com"](#); ["ian.ford@fordwallace.com"](#); ["jacquese.gray@bowmanandbrooke.com"](#); ["jameskennedy@piercesloan.com"](#); [Jay Berly](#); ["jobb@gwblawfirm.com"](#); ["jcuttino@gwblawfirm.com"](#); ["jhansen@gwblawfirm.com"](#); ["jholder@dobslegal.com"](#); [John T. Lay](#); ["jo.lyons@nelsonmullins.com"](#); [Joseph Shenkar](#); [Jon Robinson](#); ["jrukker@ruggierilaw.com"](#); ["jrutkoski@kassellaw.com"](#); ["John B. White, Jr. <Jwhite@johnbwhitelaw.com>"](#); ["kedrington@gwblawfirm.com"](#); ["keith.moskowitz@dentons.com"](#); ["kenneth.pfaehler@dentons.com"](#); [Hall, Kevin](#); ["kfelix@dobslegal.com"](#); ["kmettler@gwblawfirm.com"](#); ["kristinhoward@piercesloan.com"](#); ["landrews@burr.com"](#); ["Lgibson@burr.com"](#); [Lindsay Valek](#); ["ljones@gwblawfirm.com"](#); ["ljordan@gwblawfirm.com"](#); ["ljoynes@gwblawfirm.com"](#); ["malay@lawhssm.com"](#); ["manzelmo@mcquirewoods.com"](#); ["matt.bogan@nelsonmullins.com"](#); ["meredith.keane@nelsonmullins.com"](#); ["mflynn@collinsandlacy.com"](#); ["mha@swblaw.com"](#); [Mia Shenkar](#); ["mitch.brown@nelsonmullins.com"](#); [Marghretta Shisko](#); ["murrell@smithrobinsonlaw.com"](#); [Patterson, Nancy L.](#); ["nick.charles@nelsonmullins.com"](#); ["nick.petts@dentons.com"](#); [Nicole Rice](#); ["pjones@duffyandyoung.com"](#); [Peter Santos](#); ["pwooten@duffyandyoung.com"](#); ["rcavalchire@nexsenpruet.com"](#); ["reli@duanemorris.com"](#); ["rgoetz@omm.com"](#); ["robert.meriwether@nelsonmullins.com"](#); [Robert Sumner](#); ["rwroten@duanemorris.com"](#); [Kaczmarczyk, Sandra](#); ["santellep@whiteandwilliams.com"](#); ["sasmith@grsm.com"](#); ["sbook@gwblawfirm.com"](#); [Schutte, Scott T.](#); ["Seth.Erickson@troutman.com"](#); [Shanon Peake](#); ["srusso@mcquirewoods.com"](#); [Luxton, Steven A.](#); ["susan.collings@nelsonmullins.com"](#); [Teresa Gilliland](#); [Toni Hawkins](#); ["TMcVey@kassellaw.com"](#); [tom.blair@troutman.com](#); [vrawl@grsm.com](#); ["walshr@whiteandwilliams.com"](#); [WBD.SCASBESTOS](#); ["wblount@grsm.com"](#); [Harry Lee \(hlee@steptoe.com\)](#) ([hlee@steptoe.com](#)); [Wesley B. Sawyer](#); ["znoorani@omm.com"](#); ["sguerriere@grsm.com"](#); ["awilkinson@grsm.com"](#); [Paschke, Geoff](#); ["philip.reid@vonbriesen.com"](#); ["laurie.mcleroy@vonbriesen.com"](#); ["maria.piraino@vonbriesen.com"](#); [Ruppe, Alison](#); [Wells, Sarah](#); ["kelly.taylor@nelsonmullins.com"](#); ["ashley.peoples@nelsonmullins.com"](#); ["yasmeen.klein@nelsonmullins.com"](#); ["tyler.walker@nelsonmullins.com"](#); [Brady, Conor](#) ([cbrady@steptoe.com](#))

Subject: RE: Childers v. Davis Mechanical, et al. - Case No. 2021-CP-40-03484
Date: Monday, October 23, 2023 9:33:15 PM
Attachments: [image001.png](#)
[image007.png](#)
[image008.png](#)
[image862581.png](#)
[image717245.png](#)
[image481289.png](#)
[image100489.png](#)
[Appellants' Emergency Motion to Clarify and Enforce Rule 205 \(Appellate Case No. 2023-000727\).pdf](#)
[Appellants' Motion to Suspend Briefing Deadlines Pending Resolution of Rule 205 Motion \(Appellate Case No. 2023-000727\).pdf](#)

Peter and Counsel,

On behalf of all Appellants to the *Childers v. Davis Mechanical* appeal (Appellate Case No. 2023-000727), please find attached an Emergency Motion to Enforce Rule 205 and a Motion to Stay Briefing Deadlines Because of Pending Motion, which we are filing with the Court of Appeals this evening and are serving via this email. The appendices accompanying the Rule 205 motion are available through this link, which requires no password to access:
<https://download.wbd-us.com/bds/Login.do?id=A0596498618&p1=x3j234esbgkhfkjhcjlcffij20>

Best,

Todd

Todd Carroll
Partner
Womble Bond Dickinson (US) LLP

d: 803-454-7730
m: 803-446-2883
e: Todd.Carroll@wbd-us.com

1221 Main Street
Suite 1600
Columbia, SC 29201



womblebonddickinson.com



This email is sent for and on behalf of Womble Bond Dickinson (US) LLP. Womble Bond Dickinson (US) LLP is a member of Womble Bond Dickinson (International) Limited, which consists of independent and autonomous law firms providing services in the US, the UK, and elsewhere around the world. Each Womble Bond Dickinson entity is a separate legal entity and is not responsible for the acts or omissions of, nor can bind or obligate, another Womble Bond Dickinson entity. Womble Bond Dickinson (International) Limited does not practice law. Please see www.womblebonddickinson.com/us/legal-notice for further details.

From: Peter Protopapas <pdp@rplegalgroup.com>

Sent: Monday, October 23, 2023 3:51 PM

To: Kevin K. Bell <kbell@robinsongray.com>; 'JToal@sccourts.org' <jtoal@sccourts.org>; 'Diaz, Eva' <ediaz@sccourts.org>

Cc: Nicole Rice <nrice@johnbwhitelaw.com>; Diane Black <dblack@murphygrantland.com>; Wesley B. Sawyer <wsawyer@murphygrantland.com>; 'mark.phillips@nelsonmullins.com' <mark.phillips@nelsonmullins.com>; 'James.Burns@nelsonmullins.com' <James.Burns@nelsonmullins.com>; 'matt.patterson@nelsonmullins.com' <matt.patterson@nelsonmullins.com>; 'kelli.martin@nelsonmullins.com' <kelli.martin@nelsonmullins.com>; 'hollyparker@piercesloan.com' <hollyparker@piercesloan.com>; 'VISTRA-GRSMTTeam@grsm.com' <VISTRA-GRSMTTeam@grsm.com>; 'Oelhamzaoui@mgsattorneys.com' <Oelhamzaoui@mgsattorneys.com>; 'acraig@windelsmarx.com' <acraig@windelsmarx.com>; 'Ainsley.tillman@fordwallace.com' <Ainsley.tillman@fordwallace.com>; 'alegary@grsm.com' <alegary@grsm.com>; 'AMelling@burr.com' <AMelling@burr.com>; 'Angela.strickland@bowmanandbrooke.com' <Angela.strickland@bowmanandbrooke.com>; 'arolain@ruggertilaw.com' <arolain@ruggertilaw.com>; 'Asbestos@elliswinters.com' <Asbestos@elliswinters.com>; 'ashley.brathwaite@elliswinters.com' <ashley.brathwaite@elliswinters.com>; 'Ashley.Lord@bowmanandbrooke.com' <Ashley.Lord@bowmanandbrooke.com>; 'ASHuler@burr.com' <ASHuler@burr.com>; 'bduffy@duffyandyoung.com' <bduffy@duffyandyoung.com>; Benjamin Limbaugh <Benjamin.limbaugh@smithrobinsonlaw.com>; 'bensmoot@piercesloan.com' <bensmoot@piercesloan.com>; 'bjowers@nexsenpruet.com' <bjowers@nexsenpruet.com>; 'bnes@morganlewis.com' <bnes@morganlewis.com>; Edwards, Brady <brady.edwards@morganlewis.com>; 'byntema@goldbergsegalla.com' <byntema@goldbergsegalla.com>; 'caseyhewitt@piercesloan.com' <caseyhewitt@piercesloan.com>; 'cem@swblaw.com' <cem@swblaw.com>; Chris Jones

<cjones@johnbwhitelaw.com>; 'cmastrianni@lawhssm.com' <cmastrianni@lawhssm.com>;
'CShytle@mcguirewoods.com' <CShytle@mcguirewoods.com>; 'cstegmaier@collinsandlacy.com'
<cstegmaier@collinsandlacy.com>; Danny Nieto <danny@rplegalgroup.com>;
'dargabright@mcguirewoods.com' <dargabright@mcguirewoods.com>;
'deshawn.mitchell@bowmanandbrooke.com' <deshawn.mitchell@bowmanandbrooke.com>;
'dharris@goldbergsegalla.com' <dharris@goldbergsegalla.com>; 'drew.marrocco@dentons.com'
<drew.marrocco@dentons.com>; 'dwalulik@fbtlaw.com' <dwalulik@fbtlaw.com>;
'ejones@gwblawfirm.com' <ejones@gwblawfirm.com>; O'Neill, Elizabeth <Elizabeth.ONeill@wbd-
us.com>; 'elizabethtaylor@piercesloan.com' <elizabethtaylor@piercesloan.com>;
'EMoultrie@kassellaw.com' <EMoultrie@kassellaw.com>; 'eparks@ruggertilaw.com'
<eparks@ruggertilaw.com>; 'erik@hmp-law.com' <erik@hmp-law.com>;
'Glee.Henderson@bowmanandbrooke.com' <Glee.Henderson@bowmanandbrooke.com>; Griffin
Lynch <glynch@johnbwhitelaw.com>; 'gmforan@duanemorris.com' <gmforan@duanemorris.com>;
'hlee@steptoe.com' <hlee@steptoe.com>; 'hmcmaster@collinsandlacy.com'
<hcmaster@collinsandlacy.com>; 'ian.ford@fordwallace.com' <ian.ford@fordwallace.com>;
'jacquese.gray@bowmanandbrooke.com' <jacquese.gray@bowmanandbrooke.com>;
'jameskennedy@piercesloan.com' <jameskennedy@piercesloan.com>; Jay Berly
<jay.berly@butlersnow.com>; 'jcobb@gwblawfirm.com' <jcobb@gwblawfirm.com>;
'jcuttino@gwblawfirm.com' <jcuttino@gwblawfirm.com>; 'jhansen@gwblawfirm.com'
<jhansen@gwblawfirm.com>; 'jholder@dobslegal.com' <jholder@dobslegal.com>; John T. Lay
<jlay@gwblawfirm.com>; 'jo.lyons@nelsonmullins.com' <jo.lyons@nelsonmullins.com>; Joseph
Shenkar <joe@shenkar-law.com>; Jon Robinson <jon@smithrobinsonlaw.com>;
'jruggeri@ruggertilaw.com' <jruggeri@ruggertilaw.com>; 'jrutkoski@kassellaw.com'
<jrutkoski@kassellaw.com>; 'John B. White, Jr. <Jwhite@johnbwhitelaw.com>
<Jwhite@johnbwhitelaw.com>; 'kedrington@gwblawfirm.com' <kedrington@gwblawfirm.com>;
'keith.moskowitz@dentons.com' <keith.moskowitz@dentons.com>;
'kenneth.pfaehler@dentons.com' <kenneth.pfaehler@dentons.com>; Hall, Kevin <Kevin.Hall@wbd-
us.com>; 'kfelix@dobslegal.com' <kfelix@dobslegal.com>; 'kmettler@gwblawfirm.com'
<kmettler@gwblawfirm.com>; 'kristinhoward@piercesloan.com' <kristinhoward@piercesloan.com>;
'landrews@burr.com' <landrews@burr.com>; 'Lgibson@burr.com' <Lgibson@burr.com>; Lindsay
Valek <Lindsay@rplegalgroup.com>; 'ljones@gwblawfirm.com' <ljones@gwblawfirm.com>;
'ljordan@gwblawfirm.com' <ljordan@gwblawfirm.com>; 'ljoyner@gwblawfirm.com'
<ljoyner@gwblawfirm.com>; 'malay@lawhssm.com' <malay@lawhssm.com>;
'manzelmo@mcguirewoods.com' <manzelmo@mcguirewoods.com>;
'matt.bogan@nelsonmullins.com' <matt.bogan@nelsonmullins.com>;
'meredith.keane@nelsonmullins.com' <meredith.keane@nelsonmullins.com>;
'mflynn@collinsandlacy.com' <mflynn@collinsandlacy.com>; 'mha@swblaw.com'
<mha@swblaw.com>; Mia Shenkar <mia@shenkar-law.com>; 'mitch.brown@nelsonmullins.com'
<mitch.brown@nelsonmullins.com>; Marghretta Shisko <mshisko@johnbwhitelaw.com>;
murrell@smithrobinsonlaw.com; Patterson, Nancy L. <nancy.patterson@morganlewis.com>;
'nick.charles@nelsonmullins.com' <nick.charles@nelsonmullins.com>; 'nick.petts@dentons.com'
<nick.petts@dentons.com>; Nicole Rice <nrice@johnbwhitelaw.com>;
'pjones@duffyandyoung.com' <pjones@duffyandyoung.com>; Peter Santos
<PSantos@nexsenpruet.com>; 'pwooten@duffyandyoung.com' <pwooten@duffyandyoung.com>;
'rcavalchire@nexsenpruet.com' <rcavalchire@nexsenpruet.com>; 'reli@duanemorris.com'

<reli@duanemorris.com>; 'rgoetz@omm.com' <rgoetz@omm.com>;
'robert.meriwether@nelsonmullins.com' <robert.meriwether@nelsonmullins.com>; Robert Sumner
<robert.sumner@butlersnow.com>; 'rwroten@duanemorris.com' <rwroten@duanemorris.com>;
Kaczmarczyk, Sandra <sandra.kaczmarczyk@morganlewis.com>; 'santellep@whiteandwilliams.com'
<santellep@whiteandwilliams.com>; 'sasmith@grsm.com' <sasmith@grsm.com>;
'sbook@gwblawfirm.com' <sbook@gwblawfirm.com>; Schutte, Scott T.
<scott.schutte@morganlewis.com>; 'Seth.Erickson@troutman.com'
<Seth.Erickson@troutman.com>; Shanon Peake <shanonp@smithrobinsonlaw.com>;
'srusso@mcguirewoods.com' <srusso@mcguirewoods.com>; Luxton, Steven A.
<steven.luxton@morganlewis.com>; 'susan.collings@nelsonmullins.com'
<susan.collings@nelsonmullins.com>; Teresa Gilliland <tgilliland@dobslegal.com>; Toni Hawkins
<thawkins@robinsongray.com>; 'TMcVey@kassellaw.com' <TMcVey@kassellaw.com>; Carroll, Todd
<Todd.Carroll@wbd-us.com>; tom.blair@troutman.com; vrawl@grsm.com;
'walshr@whiteandwilliams.com' <walshr@whiteandwilliams.com>; WBD.SCASBESTOS
<WBD.SCASBESTOS@wbd-us.com>; 'wblount@grsm.com' <wblount@grsm.com>; Wesley B. Sawyer
<wsawyer@murphygrantland.com>; 'znoorani@omm.com' <znoorani@omm.com>;
'sguerriere@grsm.com' <sguerriere@grsm.com>; 'awilkinson@grsm.com' <awilkinson@grsm.com>;
Paschke, Geoff <Geoff.Paschke@wbd-us.com>; 'philip.reid@vonbriesen.com'
<philip.reid@vonbriesen.com>; 'laurie.mcleroy@vonbriesen.com'
<laurie.mcleroy@vonbriesen.com>; 'maria.piraino@vonbriesen.com'
<maria.piraino@vonbriesen.com>; Ruppe, Alison <Alison.Ruppe@wbd-us.com>; Wells, Sarah
<Sarah.Wells@wbd-us.com>; 'kelly.taylor@nelsonmullins.com' <kelly.taylor@nelsonmullins.com>;
'ashley.peoples@nelsonmullins.com' <ashley.peoples@nelsonmullins.com>;
'yasmeeen.klein@nelsonmullins.com' <yasmeeen.klein@nelsonmullins.com>;
'tyler.walker@nelsonmullins.com' <tyler.walker@nelsonmullins.com>
Subject: RE: Childers v. Davis Mechanical, et al. - Case No. 2021-CP-40-03484

Dear CJ Toal and Ms. Diaz

Please find attached a Notice of Filing in the Childers matter. On October 12, 2023, the Texas Secretary of State issued the attached Certificate of Revocation of Dissolution.

Sincerely

Peter Protopapas

From: Kevin K. Bell <kbell@robinsongray.com>

Sent: Monday, October 23, 2023 3:24 PM

To: 'JToal@sccourts.org' <jtoal@sccourts.org>; 'cposwal@sccourts.org' <cposwal@sccourts.org>; 'Diaz, Eva' <ediaz@sccourts.org>

Cc: Nicole Rice <nrice@johnbwhitelaw.com>; Diane Black <dblack@murphygrantland.com>; Wesley B. Sawyer <wsawyer@murphygrantland.com>; 'mark.phillips@nelsonmullins.com' <mark.phillips@nelsonmullins.com>; 'James.Burns@nelsonmullins.com' <James.Burns@nelsonmullins.com>; 'matt.patterson@nelsonmullins.com' <matt.patterson@nelsonmullins.com>; 'kelli.martin@nelsonmullins.com' <kelli.martin@nelsonmullins.com>; 'hollyparker@piercesloan.com' <hollyparker@piercesloan.com>; 'VISTRA-GRSMTeam@grsm.com' <VISTRA-GRSMTeam@grsm.com>; 'Oelhamzaoui@mgsattorneys.com' <Oelhamzaoui@mgsattorneys.com>; 'acraig@windelsmarx.com' <acraig@windelsmarx.com>; 'Ainsley.tillman@fordwallace.com' <Ainsley.tillman@fordwallace.com>; 'alegary@grsm.com' <alegary@grsm.com>; 'AMelling@burr.com' <AMelling@burr.com>; 'Angela.strickland@bowmanandbrooke.com' <Angela.strickland@bowmanandbrooke.com>; 'arolain@ruggertilaw.com' <arolain@ruggertilaw.com>; 'Asbestos@elliswinters.com' <Asbestos@elliswinters.com>; 'ashley.brathwaite@elliswinters.com' <ashley.brathwaite@elliswinters.com>; 'Ashley.Lord@bowmanandbrooke.com' <Ashley.Lord@bowmanandbrooke.com>; 'ASHuler@burr.com' <ASHuler@burr.com>; 'bduffy@duffyandyoung.com' <bduffy@duffyandyoung.com>; Benjamin Limbaugh <Benjamin.limbaugh@smithrobinsonlaw.com>; 'bensmoot@piercesloan.com' <bensmoot@piercesloan.com>; 'bjowers@nexsenpruet.com' <bjowers@nexsenpruet.com>; 'bnes@morganlewis.com' <bnes@morganlewis.com>; Edwards, Brady <brady.edwards@morganlewis.com>; 'byntema@goldbergsegalla.com' <byntema@goldbergsegalla.com>; 'caseyhewitt@piercesloan.com' <caseyhewitt@piercesloan.com>; 'cem@swblaw.com' <cem@swblaw.com>; Chris Jones <cjones@johnbwhitelaw.com>; 'cmastrianni@lawhssm.com' <cmastrianni@lawhssm.com>; 'CShytle@mcguirewoods.com' <CShytle@mcguirewoods.com>; 'cstegmaier@collinsandlacy.com' <cstegmaier@collinsandlacy.com>; Danny Nieto <danny@rplegalgroup.com>; 'dargabright@mcguirewoods.com' <dargabright@mcguirewoods.com>; 'deshawn.mitchell@bowmanandbrooke.com' <deshawn.mitchell@bowmanandbrooke.com>; 'dharris@goldbergsegalla.com' <dharris@goldbergsegalla.com>; 'drew.marrocco@dentons.com' <drew.marrocco@dentons.com>; 'dwalulik@fbtlaw.com' <dwalulik@fbtlaw.com>; 'ejones@gwblawfirm.com' <ejones@gwblawfirm.com>; 'elizabeth.oneill@wbd-us.com' <elizabeth.oneill@wbd-us.com>; 'elizabethtaylor@piercesloan.com' <elizabethtaylor@piercesloan.com>; 'EMoultrie@kassellaw.com' <EMoultrie@kassellaw.com>; 'eparks@ruggertilaw.com' <eparks@ruggertilaw.com>; 'erik@hmp-law.com' <erik@hmp-law.com>; 'Glee.Henderson@bowmanandbrooke.com' <Glee.Henderson@bowmanandbrooke.com>; Griffin Lynch <glynch@johnbwhitelaw.com>; 'gmforan@duanemorris.com' <gmforan@duanemorris.com>; 'hlee@steptoe.com' <hlee@steptoe.com>; 'hmcmaster@collinsandlacy.com' <hmcmaster@collinsandlacy.com>; 'ian.ford@fordwallace.com' <ian.ford@fordwallace.com>; 'jacquese.gray@bowmanandbrooke.com' <jacquese.gray@bowmanandbrooke.com>; 'jameskennedy@piercesloan.com' <jameskennedy@piercesloan.com>; Jay Berly <jay.berly@butlersnow.com>; 'jcobb@gwblawfirm.com' <jcobb@gwblawfirm.com>; 'jcuttino@gwblawfirm.com' <jcuttino@gwblawfirm.com>; 'jhansen@gwblawfirm.com' <jhansen@gwblawfirm.com>; 'jholder@dobslegal.com' <jholder@dobslegal.com>; John T. Lay

<jl原因@gwblawfirm.com>; 'jo.lyons@nelsonmullins.com' <jo.lyons@nelsonmullins.com>; Joseph Shenkar <joe@shenkar-law.com>; Jon Robinson <jon@smithrobinsonlaw.com>; 'jruggeri@ruggeriilaw.com' <jruggeri@ruggeriilaw.com>; 'jrutkoski@kassellaw.com' <jrutkoski@kassellaw.com>; 'John B. White, Jr. <jwhite@johnbwhitelaw.com>' <jwhite@johnbwhitelaw.com>; 'kedrington@gwblawfirm.com' <kedrington@gwblawfirm.com>; 'keith.moskowitz@dentons.com' <keith.moskowitz@dentons.com>; 'kenneth.pfaehler@dentons.com' <kenneth.pfaehler@dentons.com>; 'kevin.hall@wbd-us.com' <kevin.hall@wbd-us.com>; 'kfelix@dobslegal.com' <kfelix@dobslegal.com>; 'kmettler@gwblawfirm.com' <kmettler@gwblawfirm.com>; 'kristinhoward@piercesloan.com' <kristinhoward@piercesloan.com>; 'landrews@burr.com' <landrews@burr.com>; 'Lgibson@burr.com' <Lgibson@burr.com>; Lindsay Valek <Lindsay@rplegalgroup.com>; 'ljones@gwblawfirm.com' <ljones@gwblawfirm.com>; 'ljordan@gwblawfirm.com' <ljordan@gwblawfirm.com>; 'ljoyner@gwblawfirm.com' <ljoyner@gwblawfirm.com>; 'malay@lawhssm.com' <malay@lawhssm.com>; 'manzelmo@mcguirewoods.com' <manzelmo@mcguirewoods.com>; 'matt.bogan@nelsonmullins.com' <matt.bogan@nelsonmullins.com>; 'meredith.keane@nelsonmullins.com' <meredith.keane@nelsonmullins.com>; 'mflynn@collinsandlacy.com' <mflynn@collinsandlacy.com>; 'mha@swblaw.com' <mha@swblaw.com>; Mia Shenkar <mia@shenkar-law.com>; 'mitch.brown@nelsonmullins.com' <mitch.brown@nelsonmullins.com>; Marghretta Shisko <mshisko@johnbwhitelaw.com>; murrell@smithrobinsonlaw.com; Patterson, Nancy L. <nancy.patterson@morganlewis.com>; 'nick.charles@nelsonmullins.com' <nick.charles@nelsonmullins.com>; 'nick.petts@dentons.com' <nick.petts@dentons.com>; Nicole Rice <nrice@johnbwhitelaw.com>; Peter Protopapas <pdp@rplegalgroup.com>; 'pjones@duffyandyoung.com' <pjones@duffyandyoung.com>; Peter Santos <PSantos@nexsenpruet.com>; 'pwooten@duffyandyoung.com' <pwooten@duffyandyoung.com>; 'rcavalchire@nexsenpruet.com' <rcavalchire@nexsenpruet.com>; 'reli@duanemorris.com' <reli@duanemorris.com>; 'rgoetz@omm.com' <rgoetz@omm.com>; 'robert.meriwether@nelsonmullins.com' <robert.meriwether@nelsonmullins.com>; Robert Sumner <robert.sumner@butlersnow.com>; 'rwroten@duanemorris.com' <rwroten@duanemorris.com>; Kaczmarczyk, Sandra <sandra.kaczmarczyk@morganlewis.com>; 'santellep@whiteandwilliams.com' <santellep@whiteandwilliams.com>; 'sasmith@grsm.com' <sasmith@grsm.com>; 'sbook@gwblawfirm.com' <sbook@gwblawfirm.com>; Schutte, Scott T. <scott.schutte@morganlewis.com>; 'Seth.Erickson@troutman.com' <Seth.Erickson@troutman.com>; Shanon Peake <shanonp@smithrobinsonlaw.com>; 'srusso@mcguirewoods.com' <srusso@mcguirewoods.com>; Luxton, Steven A. <steven.luxton@morganlewis.com>; 'susan.collings@nelsonmullins.com' <susan.collings@nelsonmullins.com>; 'tgilliland@dobslegal.com' <tgilliland@dobslegal.com>; Toni Hawkins <thawkins@robinsongray.com>; 'TMcVey@kassellaw.com' <TMcVey@kassellaw.com>; 'todd.carroll@wbd-us.com' <todd.carroll@wbd-us.com>; tom.blair@troutman.com; vrawl@grsm.com; 'walshr@whiteandwilliams.com' <walshr@whiteandwilliams.com>; 'wbd.scasbestos@wbd-us.com' <wbd.scasbestos@wbd-us.com>; 'wblount@grsm.com' <wblount@grsm.com>; Wesley B. Sawyer <wsawyer@murphygrantland.com>; 'znoorani@omm.com' <znoorani@omm.com>; 'sguerriere@grsm.com' <sguerriere@grsm.com>; 'awilkinson@grsm.com' <awilkinson@grsm.com>; 'Geoff.Paschke@wbd-us.com' <Geoff.Paschke@wbd-us.com>; 'philip.reid@vonbriesen.com' <philip.reid@vonbriesen.com>;

'laurie.mcleroy@vonbriesen.com' <laurie.mcleroy@vonbriesen.com>;
'maria.piraino@vonbriesen.com' <maria.piraino@vonbriesen.com>; 'alison.ruppe@wbd-us.com'
<alison.ruppe@wbd-us.com>; 'Sarah.Wells@wbd-us.com' <Sarah.Wells@wbd-us.com>;
'kelly.taylor@nelsonmullins.com' <kelly.taylor@nelsonmullins.com>;
'ashley.peoples@nelsonmullins.com' <ashley.peoples@nelsonmullins.com>;
'yasmeen.klein@nelsonmullins.com' <yasmeen.klein@nelsonmullins.com>;
'tyler.walker@nelsonmullins.com' <tyler.walker@nelsonmullins.com>

Subject: RE: Childers v. Davis Mechanical, et al. - Case No. 2021-CP-40-03484

Chief Justice Toal and Counsel,

Good afternoon. Pursuant to Rule 59(g), attached is a copy of a Rule 59 motion and joinder by Zurich American Insurance Company with respect to the Court's Order entered on October 5, 2023.

Regards,

Kevin



KEVIN K. BELL MEMBER

DIRECT 803.227.1111

[VCARD](#) [VIEW BIO](#)
ROBINSONGRAY.COM

PO Box 11449 (29211)
Columbia, SC 29201

MERITAS[®] LAW FIRMS WORLDWIDE



NOTICE: This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please delete this message from your device.

[Supporting Green](#) print wisely.

From: Diane Black <dblack@murphygrantland.com>

Sent: Tuesday, October 17, 2023 8:52 AM

To: 'JToal@sccourts.org' <jtoal@sccourts.org>; 'cposwal@sccourts.org' <cposwal@sccourts.org>;
'Diaz, Eva' <ediaz@sccourts.org>

Cc: Nicole Rice <nrice@johnbwhitelaw.com>; Wesley B. Sawyer <wsawyer@murphygrantland.com>;
'mark.phillips@nelsonmullins.com' <mark.phillips@nelsonmullins.com>;
'James.Burns@nelsonmullins.com' <James.Burns@nelsonmullins.com>;
'matt.patterson@nelsonmullins.com' <matt.patterson@nelsonmullins.com>;
'kelli.martin@nelsonmullins.com' <kelli.martin@nelsonmullins.com>; 'hollyparker@piercesloan.com'
<hollyparker@piercesloan.com>; 'VISTRA-GRSMTTeam@grsm.com' <VISTRA-GRSMTTeam@grsm.com>;
'Oelhamzaoui@mgsattorneys.com' <Oelhamzaoui@mgsattorneys.com>;
'acraig@windelsmarx.com' <acraig@windelsmarx.com>; 'Ainsley.tillman@fordwallace.com'

<Ainsley.tillman@fordwallace.com>; 'alegary@grsm.com' <alegary@grsm.com>;
'AMelling@burr.com' <AMelling@burr.com>; 'Angela.strickland@bowmanandbrooke.com'
<Angela.strickland@bowmanandbrooke.com>; 'arolain@rugerilaw.com'
<arolain@rugerilaw.com>; 'Asbestos@elliswinters.com' <Asbestos@elliswinters.com>;
'ashley.brathwaite@elliswinters.com' <ashley.brathwaite@elliswinters.com>;
'Ashley.Lord@bowmanandbrooke.com' <Ashley.Lord@bowmanandbrooke.com>;
'ASHuler@burr.com' <ASHuler@burr.com>; 'bduffy@duffyandyoung.com'
<bduffy@duffyandyoung.com>; 'Benjamin.limbaugh@smithrobinsonlaw.com'
<Benjamin.limbaugh@smithrobinsonlaw.com>; 'bensmoot@piercesloan.com'
<bensmoot@piercesloan.com>; 'bjowers@nexsenpruet.com' <bjowers@nexsenpruet.com>;
'bnes@morganlewis.com' <bnes@morganlewis.com>; 'brady.edwards@morganlewis.com'
<brady.edwards@morganlewis.com>; 'byntema@goldbergsegalla.com'
<byntema@goldbergsegalla.com>; 'caseyhewitt@piercesloan.com'
<caseyhewitt@piercesloan.com>; 'cem@swblaw.com' <cem@swblaw.com>; 'Chris Jones
<cjones@johnbwhitelaw.com>' <cjones@johnbwhitelaw.com>; 'cmastrianni@lawhssm.com'
<cmastrianni@lawhssm.com>; 'CShytle@mcguirewoods.com' <CShytle@mcguirewoods.com>;
'cstegmaier@collinsandlacy.com' <cstegmaier@collinsandlacy.com>; 'danny@rplegalgroup.com'
<danny@rplegalgroup.com>; 'dargabright@mcguirewoods.com'
<dargabright@mcguirewoods.com>; 'deshawn.mitchell@bowmanandbrooke.com'
<deshawn.mitchell@bowmanandbrooke.com>; 'dharris@goldbergsegalla.com'
<dharris@goldbergsegalla.com>; 'drew.marrocco@dentons.com' <drew.marrocco@dentons.com>;
'dwalulik@fbtlaw.com' <dwalulik@fbtlaw.com>; 'ejones@gwblawfirm.com'
<ejones@gwblawfirm.com>; 'elizabeth.oneill@wbd-us.com' <elizabeth.oneill@wbd-us.com>;
'elizabethtaylor@piercesloan.com' <elizabethtaylor@piercesloan.com>; 'EMoultrie@kassellaw.com'
<EMoultrie@kassellaw.com>; 'eparks@rugerilaw.com' <eparks@rugerilaw.com>; 'erik@hmp-
law.com' <erik@hmp-law.com>; 'Glee.Henderson@bowmanandbrooke.com'
<Glee.Henderson@bowmanandbrooke.com>; 'Griffin Lynch <glynch@johnbwhitelaw.com>' <glynch@johnbwhitelaw.com>;
'gmforan@duanemorris.com' <gmforan@duanemorris.com>;
'hlee@steptoe.com' <hlee@steptoe.com>; 'hmcmaster@collinsandlacy.com'
<hmcmaster@collinsandlacy.com>; 'ian.ford@fordwallace.com' <ian.ford@fordwallace.com>;
'jacquese.gray@bowmanandbrooke.com' <jacquese.gray@bowmanandbrooke.com>;
'jameskennedy@piercesloan.com' <jameskennedy@piercesloan.com>; 'Jay.Berly@butlersnow.com'
<Jay.Berly@butlersnow.com>; 'jcobb@gwblawfirm.com' <jcobb@gwblawfirm.com>;
'jcuttino@gwblawfirm.com' <jcuttino@gwblawfirm.com>; 'jhansen@gwblawfirm.com'
<jhansen@gwblawfirm.com>; 'jholder@dobslegal.com' <jholder@dobslegal.com>; John T. Lay
<jlay@gwblawfirm.com>; 'jo.lyons@nelsonmullins.com' <jo.lyons@nelsonmullins.com>;
'joe@shenkar-law.com' <joe@shenkar-law.com>; 'jon@smithrobinsonlaw.com'
<jon@smithrobinsonlaw.com>; 'jruggeri@rugerilaw.com' <jruggeri@rugerilaw.com>;
'jrutkoski@kassellaw.com' <jrutkoski@kassellaw.com>; 'John B. White, Jr.
<jwhite@johnbwhitelaw.com>' <jwhite@johnbwhitelaw.com>; Kevin K. Bell
<kbell@robinsongray.com>; 'kedrington@gwblawfirm.com' <kedrington@gwblawfirm.com>;
'keith.moskowitz@dentons.com' <keith.moskowitz@dentons.com>;
'kenneth.pfaehler@dentons.com' <kenneth.pfaehler@dentons.com>; 'kevin.hall@wbd-us.com'
<kevin.hall@wbd-us.com>; 'kfelix@dobslegal.com' <kfelix@dobslegal.com>;
'kmettler@gwblawfirm.com' <kmettler@gwblawfirm.com>; 'kristinhoward@piercesloan.com'

<kristinhoward@piercesloan.com>; 'landrews@burr.com' <landrews@burr.com>;
'Lgibson@burr.com' <Lgibson@burr.com>; 'Lindsay@rplegalgroup.com'
<Lindsay@rplegalgroup.com>; 'ljones@gwblawfirm.com' <ljones@gwblawfirm.com>;
'ljordan@gwblawfirm.com' <ljordan@gwblawfirm.com>; 'ljoyner@gwblawfirm.com'
<ljoyner@gwblawfirm.com>; 'malay@lawhssm.com' <malay@lawhssm.com>;
'manzelmo@mcguirewoods.com' <manzelmo@mcguirewoods.com>;
'matt.bogan@nelsonmullins.com' <matt.bogan@nelsonmullins.com>;
'meredith.keane@nelsonmullins.com' <meredith.keane@nelsonmullins.com>;
'mflynn@collinsandlacy.com' <mflynn@collinsandlacy.com>; 'mha@swblaw.com'
<mha@swblaw.com>; 'mia@shenkar-law.com' <mia@shenkar-law.com>;
'mitch.brown@nelsonmullins.com' <mitch.brown@nelsonmullins.com>; 'Marghretta Shisko
<mshisko@johnbwhitelaw.com>' <mshisko@johnbwhitelaw.com>;
'murrell@smithrobinsonlaw.com' <murrell@smithrobinsonlaw.com>;
'nancy.patterson@morganlewis.com' <nancy.patterson@morganlewis.com>;
'nick.charles@nelsonmullins.com' <nick.charles@nelsonmullins.com>; 'nick.petts@dentons.com'
<nick.petts@dentons.com>; 'Nicole Rice <nrice@johnbwhitelaw.com>' <
<nrice@johnbwhitelaw.com>; 'pdp@rplegalgroup.com' <pdp@rplegalgroup.com>;
'pjones@duffyandyoung.com' <pjones@duffyandyoung.com>; Peter Santos
<PSantos@nexsenpruet.com>; 'pwooten@duffyandyoung.com' <pwooten@duffyandyoung.com>;
'rcavalchire@nexsenpruet.com' <rcavalchire@nexsenpruet.com>; 'reli@duanemorris.com'
<reli@duanemorris.com>; 'rgoetz@omm.com' <rgoetz@omm.com>;
'robert.meriwether@nelsonmullins.com' <robert.meriwether@nelsonmullins.com>;
'Robert.Sumner@butlersnow.com' <Robert.Sumner@butlersnow.com>;
'rwroten@duanemorris.com' <rwroten@duanemorris.com>;
'sandra.kaczmarczyk@morganlewis.com' <sandra.kaczmarczyk@morganlewis.com>;
'santellep@whiteandwilliams.com' <santellep@whiteandwilliams.com>; 'sasmith@grsm.com'
<sasmith@grsm.com>; 'sbook@gwblawfirm.com' <sbook@gwblawfirm.com>;
'scott.schutte@morganlewis.com' <scott.schutte@morganlewis.com>;
'Seth.Erickson@troutman.com' <Seth.Erickson@troutman.com>; 'shanonp@smithrobinsonlaw.com'
<shanonp@smithrobinsonlaw.com>; 'srusso@mcguirewoods.com' <srusso@mcguirewoods.com>;
'steven.luxton@morganlewis.com' <steven.luxton@morganlewis.com>;
'susan.collings@nelsonmullins.com' <susan.collings@nelsonmullins.com>; 'tgilliland@dobslegal.com'
<tgilliland@dobslegal.com>; Toni Hawkins <thawkins@robinsongray.com>;
'TMcVey@kassellaw.com' <TMcVey@kassellaw.com>; 'todd.carroll@wbd-us.com'
<todd.carroll@wbd-us.com>; 'tom.blair@troutman.com' <tom.blair@troutman.com>;
'vrawl@grsm.com' <vrawl@grsm.com>; 'walshr@whiteandwilliams.com'
<walshr@whiteandwilliams.com>; 'wbd.scasbestos@wbd-us.com' <wbd.scasbestos@wbd-us.com>;
'wblount@grsm.com' <wblount@grsm.com>; Wesley B. Sawyer <wsawyer@murphygrantland.com>;
'znoorani@omm.com' <znoorani@omm.com>; 'sguerriere@grsm.com' <sguerriere@grsm.com>;
'awilkinson@grsm.com' <awilkinson@grsm.com>; 'Geoff.Paschke@wbd-us.com'
<Geoff.Paschke@wbd-us.com>; 'philip.reid@vonbriesen.com' <philip.reid@vonbriesen.com>;
'laurie.mcleroy@vonbriesen.com' <laurie.mcleroy@vonbriesen.com>;
'maria.piraino@vonbriesen.com' <maria.piraino@vonbriesen.com>; 'alison.ruppe@wbd-us.com'
<alison.ruppe@wbd-us.com>; 'Sarah.Wells@wbd-us.com' <Sarah.Wells@wbd-us.com>;
'kelly.taylor@nelsonmullins.com' <kelly.taylor@nelsonmullins.com>;

'ashley.peoples@nelsonmullins.com' <ashley.peoples@nelsonmullins.com>;
'yasmeen.klein@nelsonmullins.com' <yasmeen.klein@nelsonmullins.com>;
'tyler.walker@nelsonmullins.com' <tyler.walker@nelsonmullins.com>

Subject: RE: Childers v. Davis Mechanical, et al. - Case No. 2021-CP-40-03484

Good morning, Justice Toal.

Attached please find Certain Insurers' Motion to Vacate or in the Alternative Motion to Reconsider the Court's October 5, 2023 Order filed October 16, 2023.

We will be hand-delivering a copy of the same to you today.

Please do not hesitate to contact Wesley Sawyer should you have any questions.

Thank you,
Diane



Diane L. Black

Legal Assistant to:
Wesley B. Sawyer
Timothy J. Newton
Jeffrey C. Kull
W. Tradd Stover

DD: 803-782-4100, Ext. 1262
Post Office Box 6648
Columbia, SC 29260
www.murphygrantland.com



Please be advised that this e-mail and any files transmitted with it are confidential attorney-client communications or may otherwise be privileged or confidential and are intended solely for the individual or entity to whom they are addressed. If you are not the intended recipient, please do not read, copy or retransmit this communication but destroy it immediately. Any unauthorized dissemination, distribution or copying of this communication is strictly prohibited.

This email has been scanned for spam and viruses by Proofpoint Essentials. Click [here](#) to report this email as spam.

Confidentiality Notice:

This email transmission may contain confidential information which is legally privileged. The content of this email and any information submitted therewith or attached thereto are intended only for the use of the individuals or entities to which this email is addressed. If you are not the intended recipient, or the person(s) responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in this transmission is strictly prohibited. If you have received this transmission in error, please immediately notify us by telephone. Thank you.