

THE STATE OF SOUTH CAROLINA  
In the Supreme Court  
APPEAL FROM DORCHESTER COUNTY  
Maite Murphy, Circuit Court Judge

RECEIVED

Nov 20 2024

S.C. SUPREME COURT

Innovative Waste Management, Inc., Respondent,

v.

Crest Energy Partners GP, LLC, Crest Energy Partners L.P.,  
Dunhill Products GP, LLC, Dunhill Products L.P., Henry Wuertz,  
and Edward H. Girardeau, Defendants,

Of Whom Crest Energy Partners GP, LLC, Crest Energy Partners  
L.P., Dunhill Products L.P., Dunhill Products GP, LLC, and Henry  
Wuertz are the Appellants.

Appellate Case No. 2023-001045

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PROOF OF SERVICE

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I hereby certify that the foregoing Motion to Argue Against Precedent has been served upon counsel for the Respondent, Wm. Michael Gruenloh, this 20th day of November, 2024, in accordance with the South Carolina Appellate Court Rules and In Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (As Amended April 24, 2024). A copy of the Electronic transmission is attached.

RESPECTFULLY SUBMITTED:

s/ David B. Marvel

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**From:** [David B. Marvel](#)  
**To:** [Mike Gruenloh \(mike@gruenloh.com\)](mailto:mike@gruenloh.com)  
**Subject:** IWM v. Crest Motion to Argue Against Precedent  
**Date:** Wednesday, November 20, 2024 9:19:00 AM  
**Attachments:** [image001.png](#)  
[2023-001045 Rule 217 Motion .pdf](#)

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Dear Mike,

I hope all is well with you. I have attached a Motion to Argue Against Precedent that I am filing with the Court today. Look forward to seeing you at the Court next month.

Best regards,

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