

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

Aug 14 2025

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas
The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2025-000520
Case No. 2024-CP-23-05956

Commissioners of Public Works of the City of Greenville,
South CarolinaRespondent,

v.

United States Pipe and Foundry Company, LLC, TEC Utilities
Supply Inc., and Hayes Pipe Supply Inc., Defendants,

of which

United States Pipe and Foundry Company, LLC, is theAppellant.

Proof of Service

I, the undersigned of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant United States Pipe and Foundry Company, LLC, do certify that I have served all counsel of record in this action with a copy of the document(s) set forth below under Supreme Court Order dated April 24, 2024:

Document(s): **Record on Appeal
Certificate of Counsel
Filing Letter**

Served:

Via Secure File Transfer (By Consent)

Adam C. Bach
John Hampton Scully
TONNSEN BACH, LLC
1306 South Church Street
Greenville, South Carolina 29605
abach@tonnsenbach.com
jscully@tonnsenbach.com
cc: Ellen Miller, emiller@tonnsenbach.com

Adam J. Levitt
Daniel Rock Flynn
Anna Claire Skinner
Jessica Holmes
DICELLO LEVITT LLP
Ten North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
alevitt@dicellolevitt.com
dflynn@dicellolevitt.com
askinner@dicellolevitt.com
jholmes@dicellolevitt.com

Justin J. Hawal
DICELLO LEVITT LLP
8160 Norton Parkway, Third Floor
Mentor, Ohio 44060
jhawal@dicellolevitt.com

*Attorneys for Respondent Commissioners of Public Works of the
City of Greenville, South Carolina*

Via Secure File Transfer (By Consent)

Rivers S. Stilwell
David C. Dill
Claire K. Atwood
MAYNARD NEXSEN PC
104 S. Main Street, Suite 900
Greenville, SC 29601
rstilwell@maynardnexsen.com
ddill@maynardnexsen.com
catwood@maynardnexsen.com

Attorneys for Defendant TEC Utilities Supply Inc.

Via Secure File Transfer (By Consent)

Gregory L. Shelton
SHELTON LAW CAROLINAS
101 S. Tryon Street, Suite 2700
Charlotte, NC 28280
greg@sheltonlawcarolinas.com

Attorney for Defendant Hayes Pipe Supply, Inc.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Matthew A. Abee

C. Mitchell Brown, SC Bar No. 012872
Email: mitch.brown@nelsonmullins.com
Matthew A. Abee, SC Bar No. 101100
Email: matt.abee@nelsonmullins.com
Yasmeen Ebbini, SC Bar No. 104681
Email: yasmeen.ebbini@nelsonmullins.com
1320 Main Street / 17th Floor
Post Office Box 11070 (29211-1070)
Columbia, SC 29201
(803) 799-2000

BEATTIE B. ASHMORE, P.A.

Beattie B. Ashmore, SC Bar No. 10419
Email: beattie@beattieashmore.com
650 East Washington Street
Greenville, SC 29601
(865) 467-1001

COLUCCI & GALLAHER P.C.

Paul G. Joyce, *Pro Hac Vice*
Email: pjoyce@cgbuffalo.com
350 Main Street, Suite 800
Buffalo, New York 14202
(716) 853-4080

Attorneys for United States Pipe and Foundry Company, LLC

Columbia, South Carolina
August 14, 2025

Matt Abee

From: Gregory Shelton <greg@sheltonlawcarolinas.com>
Sent: Wednesday, August 13, 2025 11:57 AM
To: Adam J. Levitt
Cc: Rivers S. Stilwell; Matt Abee; abach@tonnsenbach.com; P.A. Beattie B. Ashmore; Paul G. Joyce; Stephanie Gray; jscully@tonnsenbach.com; Dan Flynn; Anna Claire Skinner; Jessica Holmes; Justin Hawal; David C. Dill; Claire Atwood; Yasmeen Ebbini; Meredith Keane; Eileen Hindman; Mitch Brown; emiller@tonnsenbach.com
Subject: Re: Service of the Record on Appeal: Commissioners of Public Works v. U.S. Pipe - Appellate Case No. 2025-000520 (088126.01500)

WARNING - Unfamiliar External Sender Notification

You have not previously or recently corresponded with this sender. Use caution if corresponding to this email, following any instructions, clicking links or attachments.

[Report Suspicious](#)

Titan File is good.

Sent from my iPhone

On Aug 13, 2025, at 11:31 AM, Adam J. Levitt <alevitt@dicellolevitt.com> wrote:

That's fine with us.

Thanks.

Adam

Sent from my iPhone

On Aug 13, 2025, at 8:28 AM, Rivers S. Stilwell
<RStilwell@maynardnexsen.com> wrote:

Fine here

Rivers S. Stilwell

Shareholder
P: (864) 282-1168 | C: (864) 420-3167
RStilwell@maynardnexsen.com

104 South Main Street Suite 900

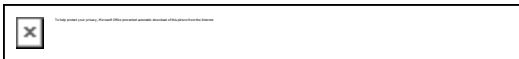
<image001.jpg>

From: Matt Abee <matt.abee@nelsonmullins.com>
Sent: Wednesday, August 13, 2025 11:21 AM
To: abach@tonnsenbach.com; Rivers S. Stilwell <rstilwell@maynardnexsen.com>; greg@sheltonlawcarolinas.com
Cc: Beattie B. Ashmore, P.A. <beattie@beattieashmore.com>; Paul G. Joyce <PJoyce@cgbuffalo.com>; Stephanie Gray <stephanie@beattieashmore.com>; jscully@tonnsenbach.com; Dan Flynn <dflynn@dicellolevitt.com>; Anna Claire Skinner <askinner@dicellolevitt.com>; Jessica Holmes <jholmes@dicellolevitt.com>; Justin Hawal <jhawal@dicellolevitt.com>; David C. Dill <ddill@maynardnexsen.com>; Claire Atwood <catwood@maynardnexsen.com>; Yasmeen Ebbini <Yasmeen.Ebbini@nelsonmullins.com>; Meredith Keane <meredith.keane@nelsonmullins.com>; Eileen Hindman <eileen.hindman@nelsonmullins.com>; Mitch Brown <mitch.brown@nelsonmullins.com>; Adam J. Levitt <alevitt@dicellolevitt.com>; emiller@tonnsenbach.com
Subject: Service of the Record on Appeal: Commissioners of Public Works v. U.S. Pipe - Appellate Case No. 2025-000520 (088126.01500)

Adam, Rivers, and Greg,

Tomorrow we have to file and serve the Record on Appeal for this case. It's too big to email, so will you consent to receive it via secure file transfer (Titan File)? If so, we will provide it to everyone listed on this email. Otherwise, I can mail a hard copy, and you'll likely receive it next week. Thanks.

-Matt



MATT ABEE PARTNER
matt.abee@nelsonmullins.com
*Licensed in South and North Carolina
MERIDIAN | 17TH FLOOR
1320 MAIN STREET | COLUMBIA, SC 29201
T 803.255.9335 F 803.256.7500
NELSONMULLINS.COM VCARD VIEW BIO

Confidentiality Notice

This message is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged, confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain,

copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately either by phone (800-237-2000) or reply to this e-mail and delete all copies of this message.

Confidentiality Notice - The information contained in this e-mail and any attachments to it is intended only for the named recipient and may be legally privileged and include confidential information. If you are not the intended recipient, be aware that any disclosure, distribution or copying of this e-mail or its attachments is prohibited. If you have received this e-mail in error, please notify the sender immediately of that fact by return e-mail and permanently delete the e-mail and any attachments to it. Thank you.

If you'd like to stay apprised of case developments and insights from one of the fastest growing plaintiffs' complex litigation firms in the United States, please subscribe [here](#) to receive our communications.

<image001.jpg>



Conversation Record with Delivery Log

Requested by: Matt Abee <matt.abee@nelsonmullins.com>

From: 134.231.159.200

https://us.titanfile.com/channels/as_pdf/snCd4e/

Produced by: TitanFile Inc.
1050 King St W, Toronto, ON M6K 0C7
+1 855-315-6012
support@titanfile.com

Generated: 14 August, 2025 16:39 EDT

Commissioners of Public Works v. U.S. Pipe - Appellate Case No. 2025-000520 (088126.01500)

Contacts:

Name	Email	Organization
Matt Abee	matt.abee@nelsonmullins.com	NMRS
Adam J. Levitt	alevitt@dicellolevitt.com	
Rivers S. Stilwell	RStilwell@maynardnexsen.com	
Adam Bach	abach@tonnsenbach.com	
Beattie B. Ashmore	beattie@beattieashmore.com	
Paul G. Joyce	PJoyce@cgbuffalo.com	
Stephanie Gray	stephanie@beattieashmore.com	
Jscully@tonnsenbach.com	jscully@tonnsenbach.com	
Dan Flynn	dflynn@dicellolevitt.com	
Anna Claire Skinner	askinner@dicellolevitt.com	
Jessica Holmes	jholmes@dicellolevitt.com	
Justin Hawal	jhawal@dicellolevitt.com	
David C. Dill	DDill@maynardnexsen.com	
Claire Atwood	CAtwood@maynardnexsen.com	
Yasmeen Ebbini	Yasmeen.Ebbini@nelsonmullins.com	NMR&S
Meredith Keane	meredith.keane@nelsonmullins.com	
Eileen Hindman	eileen.hindman@nelsonmullins.com	Nelson Mullins
Mitch Brown	Mitch.brown@nelsonmullins.com	Nelson Mullins
Emiller@tonnsenbach.com	emiller@tonnsenbach.com	

Conversation (1 messages):

Matt Abee (matt.abee@nelsonmullins.com)

14 August, 2025 16:38 EDT

Counsel:

Attached for service on you under Supreme Court Order dated April 24, 2024, please find the Record on Appeal, Certificate of Counsel, a Filing Letter, and a Proof of Service. These documents are being filed with the Court of Appeals via OneDrive and served on you by secure file transfer in light of your written consent yesterday. If you have any trouble opening the documents, please contact me or Paralegal Meredith Keane: 803-255-9564; meredith.keane@nelsonmullins.com.

Thanks,

Matt

Matthew A. Abee | Partner | Nelson Mullins Riley & Scarborough LLP

(p) 803.255.9335 | 1320 Main Street, 17th Floor, Columbia, SC 29201 | matt.abee@nelsonmullins.com

* Licensed in South and North Carolina

Certificate of Counsel for Record on Appeal - US Pipe.pdf (14.5 KB SHA2:
c6cbe425ada4a8c1d16a87603efb21ccfe2e5080eae8e081dbd7fdbe90faf30a)

MAA Proof of Service - US Pipe.pdf (311.4 KB SHA2:
ae7600d8e378531eb21be7843c8b39f79f48ca16458c4daaeba245108c7e1bd0)

2025.08.14 - MAA Filing Ltr to COA encl. Record on Appeal - US Pipe (2025-000520).pdf (74.0 KB SHA2:
ba17ae84612879263ae374b2c5b64094ac3f52b95c391a97aee6ead9070e5e)

Record on Appeal - Greenville Water v. U.S. Pipe (No. 2025-000520) 4930-1452-7326 v.2.pdf (32.3 MB SHA2:
6d24abc66f6135742cc2c2117609c084b8fa6f8ed1fdbb8d75875fa4b4a1ac09)
