

**RECEIVED**

**Nov 17 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Mikell R. Scarborough, Master-In-Equity

---

Appellate Case No. 2024-000788

Case No.: 2019-CP-10-01108

---

Balfour Beatty Construction, LLC, Appellant,

v.

Library Associates, LLC; and Metropolitan Life Insurance Company, a New York Corporation, Defendants,

And

Library Associates, LLC, Third-Party Plaintiff,

v.

Lithko Contracting, LLC, Guy M. Beaty, Inc., Bernard MMC, LLC, Gulf Stream Construction Company, Inc., Precision Walls, Inc., Palmetto Automatic Sprinkler Company, Inc., Cook & Boardman, LLC, Strong Tower Construction, LLC d/b/a Koch Corporation, Watson Electrical Construction Co., LLC, Trimark Foodcraft, LLC, Pleasant Places, Inc., David Allen Company, Inc., Premier Exteriors, LLC, Warco Construction, Inc., Old North State Masonry, LLC, Tom Rochester & Associates d/b/a Southeastern Architectural Systems, Forton Company, LLC, Low Country Case & Millwork, Inc., Quantum Coatings, LLC, Balfour Beatty Construction Group, Inc., Third-Party Defendants.

Of which Library Associates, LLC is the Respondent.

---

**APPELLANT'S CERTIFICATE OF COUNSEL**

---

The undersigned hereby certifies on November 17, 2025, that Appellant's Final Brief and Appellant's Final Reply Brief comply with Rule 211(b) of the South Carolina Appellate Court Rules.

PARKER POE ADAMS & BERNSTEIN LLP

By: /s/James Lynn Werner  
James Lynn Werner (SC Bar No. 6029)  
Katon E. Dawson, Jr. (SC Bar No. 101167)  
1221 Main Street, Suite 1100  
Columbia, SC 29201  
(803) 255-8000  
[jimwerner@parkerpoe.com](mailto:jimwerner@parkerpoe.com)  
[katondawson@parkerpoe.com](mailto:katondawson@parkerpoe.com)

Thomas C. Hildebrand, Jr. (S.C. Bar No. 2501)  
Robert C. Byrd (S.C. Bar No. 1069)  
850 Morrison Drive, Suite 400  
Charleston, SC 29403  
(843) 727- 2650 (Office)  
[tomhildebrand@parkerpoe.com](mailto:tomhildebrand@parkerpoe.com)  
[bobbybyrd@parkerpoe.com](mailto:bobbybyrd@parkerpoe.com)

*Attorneys for Appellant Balfour Beatty Construction,  
LLC*

November 17, 2025  
Columbia, South Carolina