

RECEIVED
Dec 16 2025
SC Court of Appeals

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY
Court of Common Pleas
The Honorable R. Lawton McIntosh

Case No. 2024-CP-04-02229
Appellate Case No. 2025-001549
Appellate Case No. 2025-020012

Moats Construction, Inc. and The Green Man, LLC,

Appellants,

v.

APB Partnership, LLC, Wesley Edwards, 2916 N. Main, LLC,
W.H. Bass, Inc., Whataburger Restaurants, LLC, and United
Community Bank,

Respondents.

PROOF OF SERVICE

I certify that the Appellants' Initial Brief and Designation of Matter to be Included in the Record on Appeal has been served on Daniel L. Draisen, counsel for Respondents APB Partnership, LLC, Wesley Edwards, and 2916 N. Main, LLC, by email sent to his primary e-mail address listed in the Attorney Information System, daniel@injuredsc.com, Dana Woodrum Land, counsel for W.H. Bass, Inc., by email sent to her primary e-mail address listed in the Attorney Information System, dana.lang@wbd-us.com, Paul H. Hoefer and C. Elizabeth Weston, counsel for Respondent United Community Bank, by email sent to their primary e-mail addresses listed in the Attorney Information System, phoefer@robinsongray.com and lweston@robinsongray.com, and Christopher B. Major, counsel for Whataburger Restaurants, LLC, by email sent to his primary e-mail address listed in the Attorney Information System, cmajor@hsblawfirm.com.

s/ David L. Paavola

Brian A. Autry, SC Bar No.: 69401

David L. Paavola, SC Bar No.: 100714

Caitlin S. Cameron, SC Bar No.: 106286
KENISON, DUDLEY & CRAWFORD, LLC
440 Knox Abbott Drive, Suite 510
Cayce, South Carolina 29033
(864) 242-4899
Email: autry@conlaw.com
Email: paavola@conlaw.com
Email: cameron@conlaw.com
Attorneys for Appellants

December 16, 2025
Cayce, South Carolina