

**RECEIVED**

**Dec 17 2025**

**SC Court of Appeals**

**THE STATE OF SOUTH CAROLINA  
In The Court of Appeals**

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

The Honorable Mikell R. Scarborough  
Master in Equity

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Appellate Case No. 2024-0007888  
Case No.: 2019-CP-10-01108

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Balfour Beatty Construction, LLC, Appellant,

v.

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

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.

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**MOTION TO BE RELIEVED AS COUNSEL FOR METROPOLITAN LIFE  
INSURANCE COMPANY, A NEW YORK CORPORATION AND LIBRARY  
ASSOCIATES, LLC**

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I was associated by lead counsel Walter Henry Bundy Jr. for Library Associates, LLC and Metropolitan Life to assist in some matters in the trial before Judge Mikell R Scarborough from which this appeal ensued. Mary Linton, formerly an associate of Duffy & Young, LLC, assisted me and entered an appearance. Walter Henry Bundy Jr. will continue as lead counsel and continues to be assisted by Michael Brent McDonald.

I emailed the court of this, and the court responded with a letter on June 17, 2024, advising that a motion needed to be filed.

I have no recollection of receiving this letter until earlier this week when it was provided at my request by Katon Edwards Dawson Jr., counsel for appellant . I certainly would never have ignored it. I have not been involved at all in the appeal. I have conferred with Mr Dawson, and he consents to a formal order for Mary Linton and me to be relieved as counsel. Likewise, I have conferred with Mr Bundy, and he consents as well.

I regret any inconvenience this may have caused.

s/ John P. Linton

John P. Linton, Esq.  
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*Attorney for Metropolitan Life Insurance  
Company and Library Associates, LLC*

December 17, 2025  
Charleston, South Carolina

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**PROOF OF SERVICE**

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I, John Linton, attorney for Library Associates, LLC and Metropolitan Life Insurance Company, a New York Corporation, of Duffy & Young LLC, located at 96 Broad St., Charleston, SC 29401, hereby certify that on December 17, 2025, I have served all counsel in this action a copy of the **Motion to be Relieved as Counsel** by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System.

Served:

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December 17, 2025  
Charleston, South Carolina