

**From:** [Meredith Brown](#)  
**To:** [Court Of Appeals Filings](#)  
**Cc:** [John Nichols](#); [Daniel Draisen](#); [autry@conlaw.com](#); [David Paavola](#); [cameron@conlaw.com](#); [dana.lang@wbd-us.com](#); [cmajor@hsblawfirm.com](#); [phoefer@robinsongray.com](#); [lweston@robinsongray.com](#)  
**Subject:** Case No: 2024-CP-04-02229; 2025-001549; 2025-00212- Moats Construction v APB Partnership, LLC, W Edwards, 2916 N Main, LLC  
**Date:** Monday, February 9, 2026 3:46:52 PM  
**Attachments:** [2026.02.09- Cover Ltr w POS.pdf](#)  
[2026.02.09- Ltr to C. Harrison.pdf](#)  
[2026.02.09- Motion Requesting Permission to Serve and File Outside of Deadlines.pdf](#)  
[2026.02.09- Initial Brief of Respondents ABP Partnership, LLC, W Edwards, 2916 N Main, LLC.pdf](#)  
[2026.02.09- Respondent's Designation of Additional Matter.pdf](#)

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Dear Ms. Kitchings,

Please find enclosed for filing on behalf of the Respondents APB Partnership, LLC, Wesley Edwards, and 2916 N. Main, LLC, in the above referenced matter, the below list:

1. Cover letter and Proof of Service
2. Letter to Ms. Catherine Harrison, Esq.
3. Motion Requesting Permission to Serve and File Outside the Deadlines the Initial Brief of Respondent and Respondent's Designation of Additional Matter to be Included in the Record on Appeal
4. Initial Brief of Respondents APB Partnership, LLC, Wesley Edwards, and 2916 N. Main, LLC
5. Respondent's Designation of Additional Matter to be included in the Record on Appeal
6. \$50.00 filing fee being delivered to SC Court of Appeals by USPS mail within five (5) business days

If anything else is needed, please do not hesitate to contact me.

Thank you,  
Meredith

Bluestein Thompson Sullivan, LLC

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