

From: [Daniel Draisen](#)
To: [Court Of Appeals Filings](#)
Cc: [John Nichols](#); [autry@conlaw.com](#); [David Paavola](#); [cameron@conlaw.com](#); [dana.lang@wbd-us.com](#); [cmajor@hsblawfirm.com](#); [phoefer@robinsongray.com](#); [lweston@robinsongray.com](#); [Daniel Draisen](#)
Subject: Case No: 2024-CP-04-02229; 2025-001549; 2025-00212- Moats Construction v APB Partnership, LLC, W Edwards, 2916 N Main, LLC
Date: Wednesday, March 11, 2026 3:14:45 PM
Attachments: [image002.png](#)
[image004.png](#)
[Return to Motion to Reinstate Lis Pendens.pdf](#)
[POS Return to Motion to Reinstate.pdf](#)

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Dear Mrs. Kitchings: Attached hereto for filing please find the following:

Return to Motion to Reinstate Lis Pendens (by Respondents)
Proof of Service.

Should you require anything else, please let me know. Thanks, Daniel

DANIEL L. DRAISEN, ESQ.

SENIOR ATTORNEY



****PLEASE NOTE NEW ADDRESS****

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From: Meredith Brown <meredith@bluesteinattorneys.com>

Sent: Monday, February 9, 2026 3:46 PM

To: Court Of Appeals Filings <ctappfilings@sccourts.org>

Cc: John Nichols <john@bluesteinattorneys.com>; Daniel Draisen <daniel@Injuredsc.com>; autry@conlaw.com; David Paavola <paavola@conlaw.com>; 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

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](#)



**MEREDITH BROWN OFFICE MANAGER &
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