

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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

Circuit Court Case No.: 2024-CP-04-02229
Appellate Case No.: 2025-001549
Appellate Case No.: 2025-002012

RECEIVED

Apr 20 2026

SC Court of Appeals

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 I have served a copy of the Final Brief for the Respondents APB Partnership, LLC, Wesley Edwards, and 2916 N. Main, LLC, by emailing a copy of the same on April 20, 2026, by address as follows:

David L. Paavola, Esq.
Brian A. Autry, Esq.
Caitlin S. Cameron, Esq.
Kenison Dudley & Crawford, LLC
440 Knox Abbott Drive
Ste 510
Cayce, SC 29033
864-242-4899
paavola@conlaw.com
autry@conlaw.com
cameron@conlaw.com

Attorneys for Appellant, Moats Construction, Inc. and The Green Man, LLC

Paul H. Hoefler, Esq.
Clara E. Weston, Esq.
Robinson Gray Stepp & Laffite, LLC
PO Box 11449
Columbia, SC 29211
803-227-1134
phoefler@robinsongray.com
lweston@robinsongray.com

Attorneys for Respondent, United Community Bank

Dana W. Lang, Esq.
Womble Bond Dickinson (US) LLP
PO Box 999
Charleston, SC 29402
843-722-3400
dana.lang@wbd-us.com

Attorney for Respondent, W.H. Bass, Inc.

Christopher B. Major
Haynsworth Sinkler Boyd, PA
PO Box 2048
Greenville, SC 29602
864-240-3211
cmajor@hsblawfirm.com

Attorney for Respondent, Whataburger Restaurants, LLC



Meredith Brown

Legal Assistant to John S. Nichols, Esq.
Bluestein Thompson Sullivan, LLC
meredith@bluesteinattorneys.com

April 20, 2026

cc: John S. Nichols, Esq. (john@bluesteinattorneys.com)
Daniel L. Draisen, Esq. (daniel@injuredsc.com)
Attorneys for Respondents, 2916 N. Main, LLC, APB Partnership, LLC, and Wesley Edwards

Meredith Brown

From: Meredith Brown
Sent: Monday, April 20, 2026 10:33 AM
To: Brian Autry; David Paavola; Caitlin Cameron; dana.lang@wbd-us.com; cmajor@hsblawfirm.com; Paul Hoefer; Lizzie Weston
Cc: John Nichols; Daniel Draisen
Subject: Case No: 2025-001549; 2025-002012- Moats Construction v APB Partnership- Final Brief of Respondents
Attachments: 2026.04.20- Final Brief- APB, Edwards,2916 N Main.pdf

Dear Counsel,

Please find enclosed for filing the Final Brief for Respondents APB Partnership, LLC, Wesley Edwards, and 2916 N Main, LLC, in the above reference matter.

Thank you,
Meredith

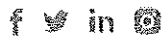


**MEREDITH BROWN OFFICE MANAGER &
LEGAL ASSISTANT TO JOHN S. NICHOLS**

1614 TAYLOR STREET | PO BOX 7965
COLUMBIA, SOUTH CAROLINA 29202
O: 803.779.7599 F: 803.771.8097

MEREDITH@BLUESTEINATTORNEYS.COM

BLUESTEINATTORNEYS.COM



NOTICE: This e-mail is confidential and may contain information which is legally privileged or otherwise exempt from disclosure. If you received this message in error, please notify the sender and delete this message from your device.