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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas
Mikell R. Scarborough, Master-In-Equity

Appellate Case No. 2024-000788

Balfour Beatty Construction, LLC, Appellant,

v.

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

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.

PROOF OF SERVICE

The undersigned, counsel for Respondent Library Associates, LLC, hereby certifies that on August 12, 2026, he served (1) Respondent's Amended Final Brief and (2) Respondent's Supplement to the Record on Appeal, Volumes 1 through 22, upon all counsel of record by electronic mail at the email addresses designated by counsel in the South Carolina Attorney Information System (AIS) as follows:

James Lynn Werner, Esq. (jimwerner@parkerpoe.com)

Katon E. Dawson, Jr., Esq. (katondawson@parkerpoe.com)

Thomas C. Hildebrand, Jr., Esq. (tomhildebrand@parkerpoe.com)

Robert C. Byrd, Esq. (bobbybyrd@parkerpoe.com)

William Greyson Land, Esq. (greysonland@hlpwlaw.com)

John Earle Tyler, Esq. (jtyler@sccourts.org)

Respectfully submitted,

s/ Jesse Sanchez
Jesse Sanchez, Esq. (S.C. Bar No. 101906)
The Law Office of Jesse Sanchez, LLC
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(843) 814-8181
jesse@jessesanchezlaw.com

Attorney for Respondent Library Associates, LLC

August 12, 2026
Mount Pleasant, South Carolina

From: **Jesse Sanchez** jesse@jessesanchezlaw.com
Subject: Balfour Beatty v. Library Associates, No. 2024-000788 - Respondent's Supplement to the Record on Appeal
Date: August 12, 2026 at 4:04 PM
To: Werner, James L. jimwerner@parkerpoe.com, Dawson, Jr., Katon E. katondawson@parkerpoe.com, tomhildebrand@parkerpoe.com, bobbybyrd@parkerpoe.com, greysonland@hlpwlaw.com
Cc: Bill Bundy walter@bundymcdonald.com, Brent McDonald brent@bundymcdonald.com, jtyler@sccourts.org

Counsel,

Pursuant to the Court's June 23, 2026 Order, below is a link to Respondent's Supplement to the Record on Appeal, Volumes 1 through 22 (Supp. R. 1 to Supp. R. 10,555). I will be uploading the same materials to the Court of Appeals momentarily via the Court's OneDrive folder.

[LINK]

You will receive Respondent's Amended Final Brief when I transmit the brief and cover letter to the Court of Appeals.

Please let me know if you have any trouble accessing the link.

Best regards,

Jesse Sanchez

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August 12, 2026

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VIA ELECTRONIC FILING (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, South Carolina 29211

RE: Balfour Beatty Construction, LLC v. Library Associates, LLC, et al.
Appellate Case No. 2024-000788

Dear Ms. Kitchings:

Pursuant to the Court's Order dated June 23, 2026, I am filing today on behalf of Respondent Library Associates, LLC in the above-referenced appeal the following:

1. Respondent's Amended Final Brief, with citations conformed to the Amended Record on Appeal, transmitted to the Court via this email to ctappfilings@sccourts.org;

2. Respondent's Supplement to the Record on Appeal, Volumes 1 through 22 (Supp. R. 1 to Supp. R. 10,555), which has been uploaded to the Court's OneDrive folder as directed by the Court's June 23, 2026 Order; and

3. Respondent's Proof of Service evidencing service of the Amended Final Brief and the Supplement to the Record on Appeal upon counsel for Appellant.

Pursuant to the Court's June 23, 2026 Order and Rule 267, SCACR, a bound hard copy of the Amended Final Brief is being delivered to the Court by mail.

For clarity, Respondent's Supplement to the Record on Appeal, cited as "Supp. R.," is distinct from Appellant's Supplement to the Amended Record on Appeal served on August 11, 2026, which bears record pages R-9877 to R-9980. All counsel of record are copied on the transmitting email and have been served with the Supplement.

Thank you for the Court's attention to this matter. As always, should you have any questions, please do not hesitate to contact me.

Sincerely,
s/Jesse Sanchez
Jesse Sanchez, Esq. (SC Bar No. 101906)
Attorney for Respondent Library Associates, LLC

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Enclosures: As stated.

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William Greyson Land, Esq.
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