

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable Jean H. Toal, Circuit Court Judge

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Case No. 2017-CP-42-04429

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**RECEIVED**  
MAY 13 2019  
SC Court of Appeals

Jerry Howard Crawford, individually and as Personal Representative of the Estate of Evelyn Kay Crawford, Respondent

v.

Celanese Corporation, Aurora Pump Company; Carrier Corporation, CNA Holdings, LLC, f/k/a Hoechst Celanese Corporation; Covil Corporation; Crane Co., Daniel International Corporation f/k/a Daniel Construction Company, Inc.; Flowserve Corporation, individually and as successor-in-interest to Anchor/Darling Valve Company, and individually as successor-in-interest to Durco Pumps; Flowserve, US Inc.; Fluor Constructors International, f/k/a Fluor Corporation; Fluor Constructors, International, Inc.; Fluor Daniel Services Corporation, Fluor Enterprises, Inc.; Ford Motor Company; Genuine Parts Company, d/b/a Rayloc (a/k/a NAPA); The Goodyear Tire & Rubber Company; Goulds Pumps, Inc.; Grinnell, LLC f/k/a Grinnell Corp., f/k/a ITT Grinnell Corp.; Honeywell International, Inc., f/k/a Allied-Products Liability Signal, Inc., sued as successor-in-interest to Bendix Corporation; Ingersoll-Rand Company; John Crane, Inc., Metropolitan Life Insurance Company, a wholly owned subsidiary of Metlife Inc.; National Automotive Parts Association, (NAPA); Parker-Hannifin Corporation, Pneumo Abex, LLC, successor-in-interest to Abex Corporation; Spirax Sarco, Inc.; SPX Cooling Technologies, Inc., individually and as successor-in-interest to Marley Cooling Towers, Co.; Standard Motor Products, Inc.; sued as successor-in-interest to EIS Automotive, United States Fidelity & Guaranty Company; and The William Powell Company, Defendants,

Of Which, Covil Corporation is the Appellant.

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**PROOF OF SERVICE**

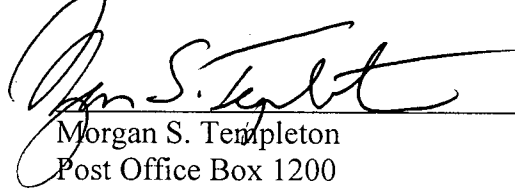
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I, Morgan S. Templeton, of Wall Templeton & Haldrup, do hereby certify that I have served a copy of the Appellant's Final Brief by depositing the same in the United States Mail, properly posted on May 9, 2019 addressed as follows to counsel of record:

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**Attorney for Respondent Jerry Howard  
Crawford and Evelyn Kay Crawford**

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THE STATE OF SOUTH CAROLINA  
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APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

The Honorable Jean H. Toal, Circuit Court Judge

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Case No. 2018-001965

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Jerry Howard Crawford, individually and as Personal Representative of the Estate of Evelyn Kay Crawford, Respondent

v.

Celanese Corporation, Aurora Pump Company; Carrier Corporation, CNA Holdings, LLC, f/k/a Hoechst Celanese Corporation; Covil Corporation; Crane Co., Daniel International Corporation f/k/a Daniel Construction Company, Inc.; Flowserve Corporation, individually and as successor-in-interest to Anchor/Darling Valve Company, and individually as successor-in-interest to Durco Pumps; Flowserve, US Inc.; Fluor Constructors International, f/k/a Fluor Corporation; Fluor Constructors, International, Inc.; Fluor Daniel Services Corporation, Fluor Enterprises, Inc.; Ford Motor Company; Genuine Parts Company, d/b/a Rayloc (a/k/a NAPA); The Goodyear Tire & Rubber Company; Goulds Pumps, Inc.; Grinnell, LLC f/k/a Grinnell Corp., f/k/a ITT Grinnell Corp.; Honeywell International, Inc., f/k/a Allied-Products Liability Signal, Inc., sued as successor-in-interest to Bendix Corporation; Ingersoll-Rand Company; John Crane, Inc., Metropolitan Life Insurance Company, a wholly owned subsidiary of Metlife Inc.; National Automotive Parts Association, (NAPA); Parker-Hannifin Corporation, Pneumo Abex, LLC, successor-in-interest to Abex Corporation; Spirax Sarco, Inc.; SPX Cooling Technologies, Inc., individually and as successor-in-interest to Marley Cooling Towers, Co.; Standard Motor Products, Inc.; sued as successor-in-interest to EIS Automotive, United States Fidelity & Guaranty Company; and The William Powell Company, Defendants,

Of Which, Covil Corporation is the Appellant.

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**CERTIFICATE OF COUNSEL**

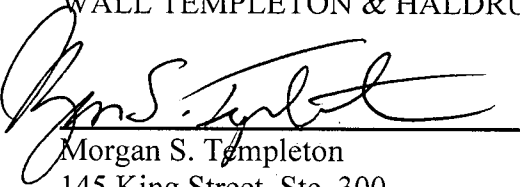
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The undersigned certifies that Appellant's Final Brief complies with Rule 211(b), *SCACR*.

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MAY 13 2019  
SC Court of Appeals

This 9<sup>th</sup> day of May 2019

WALL TEMPLETON & HALDRUP, P.A.

A handwritten signature in black ink, appearing to read "Morgan S. Templeton", written over a horizontal line.

Morgan S. Templeton

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Attorney for the Appellant



# Wall Templeton

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May 9, 2019

**VIA FEDERAL EXPRESS:**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

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MAY 13 2019  
SC Court of Appeals

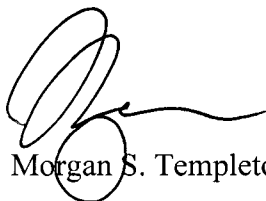
Re: Jerry Howard *Crawford vs. Aurora Pump Company, et al*  
Appellate Case No: 2018-001965

Dear Ms. Kitchings:

Enclosed for filing, please find an original and fourteen copies of Appellant's Final Brief and Final Reply Brief along with Certificate of Counsel and Proof of Service.

Sincerely,

WALL TEMPLETON & HALDRUP, P.A.



Morgan S. Templeton

MST:are

cc: Theile B. McVey, Esq. (w/ enc.)  
Jonathan M. Holder, Esq. (w/ enc.)