



# The South Carolina Court of Appeals

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May 31, 2019

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Re: Jerry Howard Crawford v. Celanese Corporation  
Appellate Case No. 2018-001965

Dear Counsel:

Upon reviewing your respondent's final brief, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and each deficiency must be corrected within ten (10) days of the date of this letter or the respondent's final brief will not be considered:

- The accompanying proof of service is not in compliance with the SCACR. Specifically, the proof of service states that the respondent's initial brief and designation of matter were served. Your proof of service should be substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.
- The document is not accompanied by the certificate of counsel, required by Rule 211(a), SCACR.
- The caption/title does not comply with Rule 267(a), SCACR. Specifically, the caption must match exactly with the one given below:

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 Celanese Corporation 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 and 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 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; The William Powell Company, Defendants,

Of Which Covil Corporation is the Appellant.

- Counsel of record for the respondent on the cover of the respondent's final brief should include Jonathan M. Holder. Also, this Court has not received an order granting pro hac vice for Mark J. Buha and Aaron D. Chapman. Therefore, they are not counsel of record for the respondent and cannot be listed as counsel on the respondent's final brief.
- Respondent is permitted to provide this Court with one (1) corrected cover page for the respondent's final brief including the corrections listed above, along with a corrected proof of service and certificate of counsel.

Very truly yours,

*V. Claire Allen, Deputy*

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cc: Ashley K. Brathwaite, Esquire  
Graham Pollock Powell, Esquire