

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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SC Court of Appeals

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Appellate 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 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 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; The William Powell Company, Defendants,

Of Which Covil Corporation is the Appellant.

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**APPELLANT'S FINAL REPLY BRIEF**

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June 7, 2019

**VIA FEDERAL EXPRESS DELIVERY**

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

Dear Ms. Allen:

I am in receipt of your deficiency letters dated May 31, 2019 regarding Covil Corporation's Record on Appeal, Final Brief, and Final Reply Brief. Per your request, I have enclosed corrected Cover Pages to correct each deficiency.

We appreciate your assistance with this matter, and if you have any questions, please do not hesitate to let me know.

Sincerely,

ELLIS & WINTERS LLP

Ashley K. Brathwaite

Enclosures

cc (U.S. Mail): Thiele B. McVey  
Jonathan M. Holder  
John D. Kassel  
Ka'Leya Hardin  
Graham P. Powell

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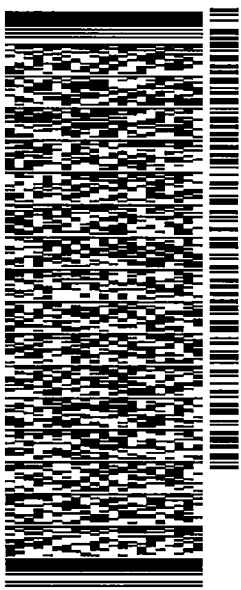
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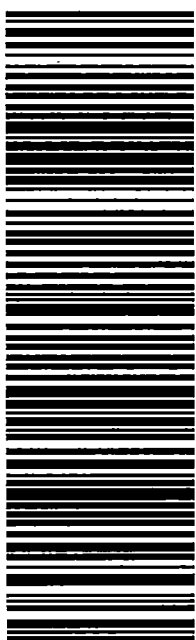


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