

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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JUN 25 2019

SC Court of Appeals

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APPEAL FROM YORK COUNTY  
Court of Common Pleas

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The Honorable Jean H. Toal  
Acting Circuit Court Judge

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Appellate Case No. 2019-000164  
Circuit Court Case No. 2015-CP-46-3456

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Timothy W. Howe, Individually and as Personal Representative of the Estate of  
Wayne Erwin Howe, Deceased, and Jeanette Howe ..... **Respondents,**

v.

Air & Liquid Systems Corp., Individually and as Successor-in-Interest to  
Buffalo Pumps, Inc.; Airco, Inc.; Airgas USA, LLC f/k/a National Welding  
Supply, Inc.; Albany International Corp.; Asten-Johnson, Inc.;  
Aurora Pump Company; A.W. Chesterton Company; Beloit Corporation;  
Black Clawson Converting Machinery LLC, Individually and as a  
subsidiary of Davis-Standard LLC; CBS Corporation, A Delaware  
corporation f/k/a Viacom, Inc., Successor by merger to CBS Corporation, A  
Pennsylvania Corporation, f/k/a Westinghouse Electric Corporation;  
CGR Products, Inc. f/k/a Carolina Gasket and Rubber Company;  
CNA Holdings, Inc., f/k/a Hoechst Celanese Corporation; Celanese Corporation  
f/k/a Hoechst Celanese Corporation (sued individually and as successor in interest  
to Fiber Industries, Inc.); Cleaver Brooks, Inc.; Covil Corporation; Crane Co.;  
Crown Cork & Seal Company, Inc.; Daniel International Corporation;  
DavisStandard Corporation, LLC; Dezurik, Inc. d/b/a Dezurik-APCO  
Willamette Eagle, Inc.; Fisher-Klosterman, Inc., as successor-in-interest to Buell  
Engineering Co.; Flowserve Corporation, Individually and as successor-in-interest to  
Durco Pumps; Fluor Enterprises, Inc. f/k/a Fluor Daniel, Inc.; Fluor Daniel Services  
Corporation; Foster Wheeler Energy Corporation; General Electric Company; The  
GormanRupp Company; Goulds Pumps, Incorporated; Ingersoll-Rand Company;  
Linde, LLC f/k/a The Boe Group, Inc. f/k/a Airco, Inc.; Marsulex Environmental  
Technologies Corporation, Individually and as successor-in-interest to Buell  
Engineering Co.; Marsulex Environment Technologies, LLC, as Successor-in-  
Interest to Buell Engineering Co.; Metropolitan Life Insurance Company, A

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wholly owned subsidiary of Metlife Inc.; Peerless Pump Company;  
Presnell Insulation, Inc; Riley Power, Inc., Individually and as  
successor-in-interest to Babcock Borsig Power, Inc. and  
Riley Stoker Corporation, Individually and as successor-in-interest to  
D.B. Riley; SCAPA Waycross, Inc.; Sepco Corporation;  
SPX Cooling Technologies, Inc. f/k/a Marley Cooling Technologies, Inc.  
f/k/a The Marley Cooling Tower Co.; Sterling Fluid Systems (USA) LLC;  
Trane U.S., Inc. f/k/a American Standard, Inc.  
f/k/a American Radiator & Standard Manufacturing Company;  
Union Carbide Corporation; Uniroyal, Inc. f/k/a United States Rubber  
Company, Inc.; United Conveyor Corporation; Velan Valve Corp.;  
Viking Pump, Inc.; Warren Pumps LLC; Yuba Heat Transfer Corporation;  
and Zurn Industries.....**Defendants,**

Of whom

Cleaver Brooks, Inc. .... **Appellant.**

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**CERTIFICATE OF COUNSEL**

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*Counsel for Respondent*

The undersigned, an attorney in this matter for the Respondent, certifies pursuant to Rule 210(g), SCACR, that this Appendix to the Record on Appeal contains only materials proposed to be included in the Record and not any other material.



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June 25, 2019

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June 25, 2019

The Honorable Jenny A. Kitchings  
South Carolina Court of Appeals  
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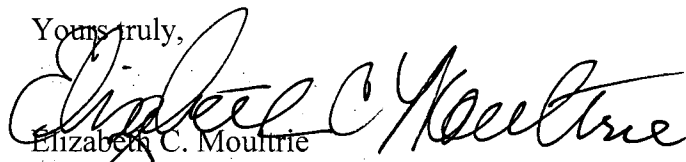
Re: *Howe v. Air & Liquid Systems, et al. Of which Cleaver-Brooks is the Appellant*  
Appeal No.: 2019-000164

Dear Ms. Kitchings:

Enclosed herewith for filing please find the unbound original and ten (10) copies of Respondent's Certificate of Counsel for Appendix II to the Record on Appeal. Although a Certificate of Counsel was included in Respondents' Appendix II, we are certifying that we have complied with Rule 210(g) of the SCACR. Please file the original and seven copies, and return the remaining clocked copies to me via the courier delivering this letter. By copy of this letter, I am providing counsel for the Appellant with a copy of this Certificate.

Thank you for your kind assistance. If you have any questions or concerns, please do not hesitate to call.

Yours truly,

  
Elizabeth C. Moutrie  
Senior Paralegal to John D. Kassel,  
Theile B. McVey and Jamie Rae Rutkoski

ECM:bmh

Enclosures

cc: M. Todd Carroll, Esquire (w/enclosures)  
M. Elizabeth O'Neill, Esquire (w/enclosures)  
Steven J. Pugh, Esquire (w/enclosures)  
Renee Melencon, Esquire (w/enclosures)