

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Jennifer B. McCoy, Circuit Court Judge

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Case No. 2017-CP-10-00838  
Appellate Case No. 2020-001210

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Jacque Lucas, Shirley Ann Lucas,  
and Daniel Simerly,

Appellants,

v.

KapStone Paper and Packaging  
Corporation, KapStone Kraft Paper  
Corporation, Safway Group  
Holdings, LLC, Easy Way Insulation  
Co., Sypris Technologies, Inc. f/k/a  
Tube-Turns Technologies Inc.,  
Thompson Construction Group, Inc.,  
and Thompson Industrial Services,  
LLC, Defendants,

Defendants,

Of which

KapStone Paper and Packaging  
Corporation and KapStone Kraft  
Paper Corporation are

Respondents.

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**PROOF OF SERVICE**

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I hereby certify that, on this date, the **(1) FINAL BRIEF OF APPELLANTS; AND (2) FINAL REPLY BRIEF OF APPELLANTS** were served on Respondents' counsel via email, pursuant to Supreme Court Order dated March 20, 2020, as amended on May 29, 2020, and via hand-delivery as follows:

**RECEIVED**  
**Mar 16 2021**  
**SC Court of Appeals**

**ATTORNEY FOR KAPSTONE PAPER AND PACKING  
CORPORATION AND KAPSTONE KRAFT PAPER  
CORPORATION**

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A copy of the service email is attached hereto, as required.

I further certify that all parties required by Rule to be served have been served.

*s/ D. Reece Williams, III*

\_\_\_\_\_  
D. Reece Williams, III

March 16, 2021  
Columbia, South Carolina

**From:** [Katie Minton](#)  
**To:** [Richard Willis](#); "[Derek Tarver](#)"  
**Cc:** [Brianna.Arnone@bowmanandbrooke.com](#); "[Kim Rothrock](#)"; "[Ducayet, Jim](#)"; [Russell Post](#); [Daniel N. Hammond](#); [Laura L. Crain](#); [Kurt Arnold](#); [Kyle Findley](#); [Adam Lewis](#); [Kala Sellers](#); [Joseph F McGowin](#); [Kristina McDonald](#); [KBA Team](#); [Harry Dixon](#); [Reece Williams](#); [Ian T. Duggan](#); [Rick Detwiler](#); [Daniel N. Nightingale](#); "[Duke R. Highfield, Esq.](#)"; [Wiseman, Jeffrey](#); "[Brandt R. Horton, Esq.](#)"; "[Anderson, Victoria \(Tori\)](#)"; "[Brennan, Sally](#)"; [hsantiago@yclr.com](#); [kstair@carlockcopeland.com](#); "[pnorris@carlockcopeland.com](#)"; [Lemons, Alexandra M.](#); "[mpeeler@carlockcopeland.com](#)"; [Shaw, Katie D.](#); [Canaday, Jenifer L.](#); [Sonaly Hendricks](#); "[Carl Pierce](#)"; [Carson Parker](#); "[William O. Sweeny IV](#)"; [sherrymanning@phswlaw.com](#); [lindsaygrady@phswlaw.com](#); "[John H. Tiller, Esq.](#)"; "[lhennigar@hsblawfirm.com](#)"; [jharvey@hsblawfirm.com](#); [mmoody@hsblawfirm.com](#); [Caplan, Robert](#); [Brian T. Gelnett - White and Williams LLP](#) ([gelnettb@whiteandwilliams.com](#))  
**Subject:** Appellate Case No. 2020-001210 | [Jacque Lucas, Shirley Ann Lucas and Daniel Simerly vs. KapStone Paper and Packaging Corporation, et al.](#)  
**Date:** Tuesday, March 16, 2021 10:26:00 AM  
**Attachments:** [2021-03-16 Ltr to Clerk Court of Appeals.010 \(Final Briefs of Appellants\).pdf](#)  
[FINAL Brief of Appellants. 3-15-2021.pdf](#)  
[FINAL Reply Brief of Appellants. 3-15-2021.pdf](#)  
[2021-03-16 Proof of Delivery - Final Briefs of Appellants.pdf](#)

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Dear Mr. Willis and Mr. Tarver,

Attached please find the Final Brief of Appellants and Final Reply Brief of Appellants; Proof of Service; and letter to the appellate clerk regarding the above-referenced matter. The attached documents are being submitted today to the Court of Appeals for filing.

Hard/bound copies of the briefs will be hand-delivered to your office today.

With kind regards,



**Katie A. Minton**

**Litigation Paralegal**

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