

THE STATE OF SOUTH CAROLINA
In the Supreme Court

RECEIVED

Nov 08 2021

S.C. SUPREME COURT

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas
D. Garrison Hill, Circuit Judge

Appellate Case No. 2019-00816
Case No. 2013-CP-42-3915

Angie Keene, Individually and as Personal
Representative of the Estate of Dennis Seay, Deceased,
and Linda Seay,..... Respondents,

v.

CNA Holdings, LLC,..... Petitioner.

PROOF OF SERVICE

This is to certify that the undersigned counsel, a shareholder with the law firm Willoughby & Hoefler, P.A., has caused to be served this day one (1) copy of the South Carolina Manufacturers Alliance’s Motion for Leave to File an *Amicus Curiae* Brief via electronic mail at the email addresses reflected in the Attorney Information System and as set forth below:

C. Mitchell Brown, Esquire
A. Mattison Bogan, Esquire
Blake T. Williams, Esquire
Nelson Mullins Riley & Scarborough, LLP
mitch.brown@nelsonmullins.com
matt.bogan@nelsonmullins.com
blake.williams@nelsonmullins.com

Richard C. Godfrey, Esquire
Kirkland & Ellis
richard.godfrey@kirkland.com

John D. Kassel, Esquire
Theile B. McVey, Esquire
Kassel McVey
jkassel@kassellaw.com
tmcvey@kassellaw.com

Chris J. Panatier, Esquire
Simon Greenstone Panatier PC
cpanatier@sgptrial.com

Kevin W. Paul, Esquire
Dean Omar Branham Shirley, LLP
kpaul@dobslegal.com

Bert G. Utsey, III, Esquire
Clawson Fagnoli Utsey
bert@cfulaw.com

William H. Foster, Esquire
Katie E. Towery, Esquire
Littler Mendelson, P.C.
bfoster@littler.com
ktowery@littler.com

Gray T. Culbreath, Esquire
Eleanor L. Jones, Esquire
Gallivan White & Boyd, P.A.
gculbreath@gwblawfirm.com
ejones@gwblawfirm.com

Christopher E. Mills, Esquire
Spero Law LLC
cmills@spero.law

T. David Hoyle, Esquire
Anne McGinness Kearse, Esquire
W. Taylor C. Lacy, Esquire
Motley Rice LLC
dhoyle@motleyrice.com
akearse@motleyrice.com
wlacy@motleyrice.com

A copy of the email serving counsel as stated above is attached hereto as Exhibit 1.

s/John W. Roberts
John W. Roberts, S.C. Bar No. 78889

November 8, 2021
Columbia, South Carolina

EXHIBIT 1

Elizabeth P. Kurtz

From: John Roberts
Sent: Monday, November 8, 2021 11:54 AM
To: mitch.brown@nelsonmullins.com; matt.bogan@nelsonmullins.com; blake.williams@nelsonmullins.com; richard.godfrey@kirkland.com; jkassel@kassellaw.com; tmcvey@kassellaw.com; cpanatier@sgptrial.com; kpaul@dobslegal.com; bert@cfulaw.com; bfoster@littler.com; ktowery@littler.com; Gray Culbreath; ejones@gwblawfirm.com; cmills@spero.law; dhoyle@motleyrice.com; akearse@motleyrice.com; wlacy@motleyrice.com
Cc: Elizabeth P. Kurtz
Subject: Angie Keene, Individually and as Personal Representative of the Estate of Dennis Seay, Deceased, and Linda Seay, v. CNA Holdings, LLC; Appellate Case No. 2019-00816
Attachments: 2021-11-08 Filing Ltr SCMA's Motion for Leave to File an Amicus Brief.pdf; 2021-11-08 SCMA Motion for Leave to File Amicus Brief.pdf; 2021-11-08 POS SCMA's Motion for Leave to File Amicus Brief.pdf

Good morning,

Attached for service upon you are the following:

1. Filing letter to the Hon. Patricia A. Howard;
2. Motion for Leave to File an *Amicus Curiae* Brief on behalf of the South Carolina Manufacturers Alliance; and
3. Proof of Service (without a copy of this email).

Should you have any difficulty opening any of these documents, please advise us.

Thank you.

John

John W. Roberts, Esquire
WILLOUGHBY & HOEFER, P.A.
930 Richland Street
Post Office Box 8416
Columbia, South Carolina 29202
Telephone #: (803) 252-3300
Facsimile #: (803) 256-8062
E-mail address: jroberts@willoughbyhoefer.com

Confidentiality Notice: The information contained in this transmittal, including any attachment, is privileged and confidential information and is intended only for the person or entity to which it is addressed. If you are neither the intended recipient nor the employee or agent responsible for delivering this message to the intended recipient, you are hereby notified that any disclosure, copying or distribution or the taking of any action in reliance on the contents of this transmittal is strictly prohibited. If you have received this transmittal in error, please contact the sender immediately by telephoning the sender at (803) 252-3300 and, also, please delete this transmittal from any computer or other data bank. Upon request, we will reimburse your reasonable costs of notifying us of a transmission error. Thank you.

IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein. This advice may not be forwarded (other than within the taxpayer to which it was sent) without our express written consent.