ELECTRONICALLY FILED - 2026 Nov 16 11:14 AM - RICHLAND - COMMON PLEAS - CASE#2025CP4002870

STATE OF SOUTH CAROLINA COUNTY OF RICHLAND EMMA ELIZABETH MULLER, INDIVIDUALLY AND AS PERSONAL REPRESENTATIVE OF THE ESTATE OF JAMES MICHAEL MULLER, Plaintiff, vs. CITY OF COLUMBIA AND COUNTY OF RICHLAND, Defendants. vs. CITY OF COLUMBIA, Third-Party Plaintiff, vs. IRMO FIRE DISTRICT, A SPECIAL PURPOSE DISTRICT, Third-Party Defendant.	)	IN THE COURT OF COMMON PLEAS Civil Action No. 2025CP4002870 **OFFER OF JUDGEMENT**

Pursuant to Rule 68 of the South Carolina Rules of Civil Procedure, Third-Party Defendant, Irmo Fire District, hereby offers to settle the matter on the following terms:

1. Terminate the employment of Aubrey Jenkins and Anthony Holloway, effective immediately.
2. Reimburse all legal fees and costs incurred to date, which total approximately **$40,296.00**, within 30 days of acceptance of this demand.

3. Issue a written apology authored by Aubrey Jenkins, disseminated for publication to The State and The Post and Courier, for the false allegations that Irmo Fire, or any of its employees, gave false statements to any investigative agency involved in this fire. This must be submitted to the referenced publications within 30 days of acceptance.
4. Issue a written apology authored by Anthony Holloway, disseminated for publication to The State and The Post and Courier, for falsely alleging Sloane Valentino wrote the NIOSH report. This must be submitted to the referenced publications within 30 days of acceptance.
5. Dismiss, with prejudice, all claims against Irmo Fire.

Should this Offer not be accepted within twenty (20) days, the Offer will be deemed rejected, and Defendants shall proceed with litigating the matter in preparation for trial.

This Offer shall not in any way be considered an admission of liability on third-party defendant part. The Offer is made only in an effort to avoid the otherwise necessary costs of litigating this matter in preparation for trial.

Respectfully submitted,

MCANGUS GOUDELOCK & COURIE, LLC

s/Brett H. Bayne

BRETT H. BAYNE (SC Bar No. 100018)
brett.bayne@mgclaw.com
LAUREN T. MODZELEWSKI (SC Bar No. 104706)
lauren.modzelewski@mgclaw.com
1320 Main Street, 10th Floor
Columbia, South Carolina 29201
Telephone: (803) 779-2300
Facsimile: (803) 748-0526
Attorneys for Irmo Fire District

ELECTRONICALLY FILED - 2026 Nov 16 11:14 AM - RICHLAND - COMMON PLEAS - CASE#2025CP4002870