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Jun 22 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM WILLIAMSBURG COUNTY

Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge

Case No: 2014-CP-45-00132

Appellate Case No: 2021-000835

South Carolina Farm Bureau Ins. Co, Plaintiff
v.

Marion L. Driggers, Shiralee Driggers, Tammy D.
Floyd, Estate of Arthur McKenzie, The Travelers
Home and Marine Insurance Company, The
United States of America acting by and through
Its agency, The Internal Revenue Service, and
The South Carolina Tax Commission, Defendants,

Of Which Marion L. Driggers is Appellant and The Travelers
Home and Marine Insurance Company is the Respondent.

**INITIAL DESIGNATION OF MATTER BY
SOUTH CAROLINA FARM BUREAU INS. CO.**

The plaintiff, South Carolina Farm Bureau Ins. Co. proposes that the following be included in the
Record On Appeal:

- All matter referenced in South Carolina Farm Bureau's Initial Brief
- All matter designated by other parties
- Summons and Complaint dated 3.06.2014 – inclusive with all attachments
- Amended Summons and Complaint dated 7.13.2016

- Travelers Answer and Crossclaims For Interpleader dated 5.16.2014
- Travelers Answer To Amended Complaint & Claims For Interpleader and Contribution dated 9.13.2016
- Driggers, Driggers & Floyd's Answer, Counterclaims and Crossclaims dated 4.08.2014
- M. Driggers Answer To Amended Complaint dated 8.10.2016
- S. Driggers & T Floyd's Answer, Counterclaims & Crossclaims re Amended Complaint dated 7.28.2016
- Deed to Floyd
- Contract For Sale And Purchase
- Assignment of Contract For Sale And Purchase
- EUO of M. Driggers, p. 58-60
- EUO of S. Driggers, p. 9-16
- Order of Judge Shuler, recorded 7.10.1996
- Transcript, p. 55
- Order of 3.30.21 re Summary Judgment to Travelers re FB Equitable Indemnity claim,
- Order of 1.05.21
- Order of 4.19.21 Dismissing Travelers
- Settlement Agreement, Travelers with McKenzie
- Travelers Declarations Page
- Travelers Policy
- SC Farm Bureau Declarations Page
- SC Farm Bureau Policy
- Travelers Discovery Document 3-14, Claim Notes
- Travelers Discovery Document 29-34, Internal Correspondence
- EUO of M. Driggers, p. 36-37

See Following Page For Certification & Signature

CERTIFICATION:

I certify that this Designation contains no matter which is irrelevant to this appeal.

J. Dwight Hudson

J. Dwight Hudson (SCB# 2753)

Hudson & Graham

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Dated: June 22, 2022

Attorney For Appellant

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Floyd, Estate of Arthur McKenzie, The Travelers
Home and Marine Insurance Company, The
United States of America acting by and through
Its agency, The Internal Revenue Service, and
The South Carolina Tax Commission, Defendants,

Of Which Marion L. Driggers is Appellant and The Travelers
Home and Marine Insurance Company is the Respondent.

***PROOF OF SERVICE OF INITIAL BRIEF AND
DESIGNATION BY SOUTH CAROLINA FARM BUREAU
INS. CO.***

I certify that on June 22, 2022, I served South Carolina Farm Bureau Ins. Co.'s Initial Brief and Initial Designation of Matter *on* counsel as noted below and as established by the copy of email service enclosed herewith.

1st J. Dwight Hudson

J. Dwight Hudson (SCB# 2753)
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Dated: June 22, 2022

Attorney For Appellant

Counsel: By e-mail as noted below, directed to the address registered with AIS:

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Attorney for SC Tax Commission

From: mgraham hudsonlawoffice.com
Sent: Wednesday, June 22, 2022 1:49 PM
To: Norton, Mariel; epritchard@pritchardlawgroup.com; Daryl J. Corbin Esq. (corbinlawfirm@corbinlawsc.com); Conits, George (USASC); 'Tasha.Thompson@schousing.com'; Reese Boyd III
Cc: Cathy Plocinik; Kelly M. Turek, Esq.; Jill Corbin; Daryl Corbin; Rosa Raspaldo
Subject: 2021-000835 SC Farm Bureau vs. Marion L. Driggers, et al. of Whom Marion L. Driggers is the Appellant and The Travelers Insurance Company is the Respondent
Attachments: Initial Brief of SCFB.pdf; DOM of SCFB.pdf

Counselors:

Enclosed and served today, June 22, 2022, are South Carolina Farm Bureau's Initial Brief and Designation in the above referenced matter. The same will be subsequently e-filed with the Court of Appeals, along with a forwarding letter and a Proof of Service of the enclosures, showing service by this email. We will also copy you with the e-filing.

With best regards,

J. Dwight Hudson, Esq.

By: Mary Anne Graham, Esq.

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ADMITTED IN S.C. and N.C.*
United States Supreme Court*
U.S. Court of Appeals 4th Circuit**
U.S. District Court – South Carolina**
U.S. District Court – North Carolina*
(Eastern, Middle and Western Districts)
S.C. Supreme Court**
N.C. Supreme Court*
S.C. Court of Appeals**
N.C. Court of Appeals*

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June 22, 2022
Via Court of Appeals Efiling

The Hon. Jenny Abbott Kitchings
Clerk, SC Court of Appeals
PO Box 11629
Columbia, SC 29211
ctappfilings@sccourts.org

RECEIVED
Jun 22 2022
SC Court of Appeals

Re: *SC Farm Bureau Mutual Ins Co. v. Driggers et al, Case No.: 2021-000835*

Dear Ms. Kitchings:

Enclosed for filing are the following:

1. Appellant’s Initial Brief
2. Appellant’s Designation Of Material To Be Included In The Record
3. Proof of Service of the Same

By copy of this letter, the enclosures are served as per the enclosed Proof of Service.

With best regards, I remain

J. Dwight Hudson, Esq.
J. Dwight Hudson, Esq.

JDH: mag
Enclosure(s): as stated
Cc: Counsel Via AIS Registered Email