



HARPOOTLIAN
ATTORNEYS AT LAW

RICHARD A. HARPOOTLIAN
RAH@HARPOOTLIANLAW.COM

CHRISTOPHER P. KENNEY
CPK@HARPOOTLIANLAW.COM

PHILLIP D. BARBER
PDB@HARPOOTLIANLAW.COM

OFFICE

1410 LAUREL STREET
COLUMBIA, SC
29201

MAILING ADDRESS

POST OFFICE BOX 1090
COLUMBIA, SC
29202

DIRECT CONTACT

TELEPHONE (803) 252-4848
FACSIMILE (803) 252-4810
TOLL FREE (866) 706-3997

ONLINE

HARPOOTLIANLAW.COM

August 11, 2022

RECEIVED

AUG 15 2022

S.C. SUPREME COURT

The Honorable Patricia A. Howard
Clerk of Court
Supreme Court of South Carolina
P.O. Box 113300
Columbia, SC 29211

In re: Travelers Property Casualty Company of America v. Barbara Hawthorne, as personal representative of the Estate of Nathaniel Hawthorne, Jr., certified question from the U.S. States District Court for the District of South Carolina Appellate No. 2022-000887

Dear Ms. Howard

Rule 244(b) of the South Carolina Rules of Appellate Procedure requires a party who "believes that additional materials from the record before the certifying court are necessary" in answering the certified question to notify both the certifying court and this Court. Pursuant to Rule 244(b), the Plaintiff in this certified-question matter filed a motion with the district court asking it to submit certain documents filed with the district court to this Court for consideration in deciding this matter. Defendant responded, consenting to submission of the documents Plaintiff identified but asking the district court to submit certain additional items filed with the district court but omitted from Plaintiff's request. My understanding that Plaintiff does not object to the inclusion of the additional items, and that the parties agree on the additional materials which should be transmitted from the district court. These documents are

1. Plaintiff's Complaint (ECF 1) and exhibit (ECF No. 1-1);
2. Defendant's Answer and Counterclaim (ECF No. 11);
3. Plaintiff's Answer to Defendant's Counterclaim (ECF No. 17);
4. Defendant's Motion for Judgment on the Pleadings (ECF No. 20) and exhibits (ECF Nos. 20-1, 20-2, 20-3);
5. Plaintiff's Motion for Judgment on the Pleadings, or in the Alternative, Motion for Summary Judgment (ECF No. 28) and exhibits (ECF Nos. 28-1, 28-2);
6. Plaintiff's Response to Defendant's Motion for Judgment on the Pleadings (ECF No. 29);
7. Plaintiff's Reply in Support of its Motion for Judgment on the Pleadings (ECF No. 30);

8. Defendant's Response to Plaintiff's Motion for Judgment on the Pleadings (ECF No. 31);
9. Plaintiff's Reply in Support of its Motion for Judgment on the Pleadings (ECF No. 33);
10. Defendant's Motion to Certify Question and exhibits (ECF Nos. 35, 35-1, 35-2, 35-3);
11. Plaintiff's Response to Defendant's Motion to Certify Question (ECF No. 36);
12. Defendant's Reply in Support of its Motion to Certify Question (ECF No. 37).

Accordingly, Defendant hereby notifies the Court, pursuant to Rule 244(b), that the parties believe the foregoing documents are necessary in answering the certified question before the Court and that they have requested the district court to submit these documents to the Court for its consideration. A copy of Plaintiff's motion and Defendant's response filed in the district court are enclosed hereto.

Thank you for your attention in this matter.

Sincerely,



Phillip D. Barber

Enclosures
cc: All Counsel of Record

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POST OFFICE BOX 1090
COLUMBIA, SC 29202

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