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SC Court of Appeals

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

Case No.: 2021-000835

South Carolina Farm Bureau Mutual 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 whom Marion L. Driggers is the Appellant and The Travelers Home and Marine
Insurance Company is the Respondent.**

DESIGNATION OF MATTER

I. ORDERS

1. Order of the Williamsburg County Court of Common Pleas dated March 4, 2021
2. Order of the Williamsburg County Court of Common Pleas dated March 30, 2021
3. Order of the Williamsburg County Court of Common Pleas dated June 25, 2021

II. PLEADINGS

1. Complaint, 3/10/2014
2. Answer of Marion L. Driggers, Shiralee Driggers and Tammy Floyd, 4/8/2014
3. Plaintiff's Reply to Answer, 4/29/2014
4. Answer of SC DOR, 5/6/2014
5. Answer and Crossclaim of Travelers, 5/19/2014
6. Answer of Arthur McKenzie, 5/28/2014
7. Answer of Internal Revenue Service, 5/28/2014
8. Plaintiff's Answer to Crossclaim of Travelers, 6/13/2014
9. Answer of Arthur McKenzie to Crossclaim of Travelers, 7/3/2014
10. Answer of Travelers to Crossclaim of Driggers, 7/7/2014
11. Plaintiff's Motion to Compel, 12/18/2014
12. Order Granting Motion to Compel, 3/4/2015
13. Driggers Answer to Request to Admit, 6/16/2015
14. Marion Driggers Motion for Summary Judgment against Arthur McKenzie, 8/17/2015
15. Order of Continuance, 10-8-2015
16. Consent Scheduling Order, 11/16/2015
17. Consent Motion to Amend with Amended Answer, 12/1/2015
18. Marion Driggers Motion to Amend and Amended Answer, 12/4/2015
19. Travelers Motion for Order Allowing Funds to Be Deposited with the Court, 12/10/2015
20. Marion Driggers Motion to Compel, 1/21/2016

21. Order Motion to Compel, 2/12/2016
22. Answer of Travelers to counterclaim of Driggers, 2/25/2016
23. Marion Driggers Motion to Compel, 3/2/2016
24. Plaintiff's Motion to Amend, 3/7/2016
25. Marion Driggers Reply to Amended Crossclaim of McKenzie, 3/14/2016
26. Plaintiff's Motion to Quash, 3/24/2016
27. Answer of McKenzie to Marion Driggers Amended Crossclaim and Amended Crossclaim of McKenzie, 4/5/2016
28. Answer of Travelers to Plaintiff's counterclaims, 4/6/2016
29. Marion Driggers Motion for Summary Judgment, 4/20/2016
30. Marion Driggers Motion to Release Counsel, 4/20/2016
31. Order on 7 pending Motions, 4/28/2016
32. Arthur McKenzie Memorandum in Opposition to Motion to Disqualify counsel, 5/5/2016
33. Marion Driggers Motion to Compel, 5/9/2016
34. Amended Complaint, 6/13/2016
35. Answer, Crossclaims and Counterclaims of Shiralee Driggers and Tammy Floyd, 7/28/2016
36. Answer of Marion Driggers, 8/15/2016
37. Answer of South Carolina Farm Bureau, 8/29/2016
38. Answer of USA through the Internal Revenue Service, 9/6/2016
39. Travelers Answer to Crossclaim and Counterclaim of Shiralee Driggers and Floyd, 9/12/2016
40. Travelers Answer to Plaintiff's Amended Complaint, Cross-claim for Interpleader and Counterclaim for Contribution, 9/13/2016

41. Plaintiff's reply to Counterclaims of Travelers, 10/13/2016
42. Marion Driggers Motion to Compel, 10/18/2016
43. Marion Driggers Motion to Amend, 10/18/2016
44. Marion Driggers Motion for Sanctions, 10/18/2016
45. Affidavit of Elisa Richardson, 10/24/2016
46. Affidavit of Arthur McKenzie, 10/24/2016
47. Order Denying Marion Driggers motions, 12/16/2016
48. Marion Driggers Motion for Reconsideration, 1/9/2017
49. Marion Driggers Mediation Memo, 1/19/2017
50. Marion Driggers Reply to McKenzie's Answer to Motion to Compel, 2/3/2017
51. Travelers Memorandum in Opposition to Motion for Reconsideration, 2/9/2017
52. Order Motion to Compel, 3/15/2017
53. Marion Driggers Motion to Compel, 3/19/2017
54. Marion Driggers Motion for Reconsideration, 5/24/2017
55. Order Denying Motion for Reconsideration, 6/20/2017
56. Marion Driggers Motion to Produce, 5/10/2018
57. Marion Driggers Motion to Compel, 7/30/2018
58. Marion Driggers Motion to Amend Answer to include crossclaim, 7/30/2018
59. Travelers Motion for Summary Judgment, 4/11/2019
60. Travelers Motion for Summary Judgment, 4/11/2019
61. Travelers Motion for Summary Judgment, 4/11/2019
62. Plaintiff Notice for Invocation of damages cap, 3/9/2020

63. Plaintiffs' Memorandum in Support of Motion to Quash, 6/26/2020
64. Arthur McKenzie Memorandum in Opposition to Motion for Reconsideration, 7/6/2020
65. Travelers Memorandum in Opposition to Motions of Travelers and Marion Driggers, 7/6/2020
66. Plaintiff's Motion for Summary Judgment, 7/6/2020
67. Order on Plaintiff's Motion to Quash, 9/23/2020
68. Order on Marion Driggers Motion to Amend Answer, 9/28/2020
69. Order Motion to Produce, 9/29/2020
70. Email Ruling of the Honorable Kristi F. Curtis, 11/19/2020
71. Scheduling Order, 10/5/2020
72. Consent Confidentiality Order, 11/19/2020
73. Consent Order extend deadlines, 12/18/2020
74. Marion Driggers Motion for Reconsideration, 12/29/2020
75. Order Motion for Reconsideration, 12/29/2020
76. Travelers Memorandum in Opposition to Motion for Reconsideration, 2/17/2021
77. Order Allowing Funds to be Deposited with the Court, 1/5/2021
78. Plaintiff's Motion to Alter/ Amend/Reconsider, 1/14/2021
79. Order granting Travelers Motion for Summary Judgment, 3/4/2021
80. Amended Scheduling Order, 3/13/2021
81. Order granting Travelers Motion for Summary Judgment as to Cause of Action for Equitable Indemnity of Plaintiff, 3/30/2021
82. Plaintiff's Motion for Reconsideration, 4/8/2021
83. Plaintiff's Motion for Amended Scheduling Order, 4/9/2021

84. From 4 Order denying Plaintiff's Motion to Amend, 4/12/2021
85. Form 4 Order denying Plaintiff's Motion to Reconsider, 4/12/2021
86. Order dismissing Travelers, 4/19/2021
87. McKenzie Motion for Summary Judgment, 4/20/2021
88. Motion of Defendants Shiralee Driggers and Floyd for Bifurcation, 4/21/2021
89. Letter from Pritchard with exhibits in support of Motion for Bifurcation, 4/21/2021
90. Plaintiff's Reply to Motion to Bifurcate, 4/29/2021
91. Plaintiff's Notice of Appeal, 5/11/2021
92. Order Denying Marion Driggers Motion for Reconsideration, 6/25/2021
93. Marion Driggers Request for Clarification, 7/8/2021
94. Marion Driggers Notice of Appeal, 8/4/2021
95. Marion Driggers Notice of Appeal, 8/13/2021
96. Marion Driggers Amended Notice of Appeal, 9/1/2021
97. Notice of Appearance of Reese R. Boyd, III on behalf of Marion Driggers and Amended Notice of Appeal, 10/22/2021
98. Travelers Motion to Dismiss Appeal, 10/26/2021
99. Marion Driggers Reply to Travelers Motion to Dismiss Appeal, 11/15/2021
100. Court of Appeals Order Denying Travelers Motion to Dismiss, 12/10/2021

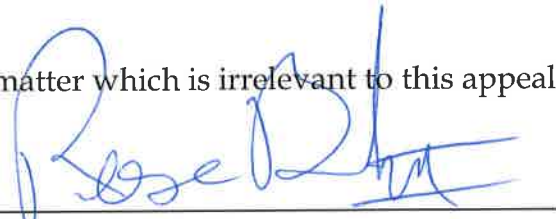
III. LOWER COURT HEARING

1. Hearing transcript September 17, 2020
2. Hearing transcript February 18, 2021

IV. DOCUMENTS

1. Travelers Claim Notes
2. Contract of insurance between Travelers and Arthur McKenzie / Travelers Policy Number 9847612886331
3. Contract of insurance between Farm Bureau Insurance and Marion L. Driggers / Farm Bureau Policy Number FI 0401219
4. Payment by Travelers to the Court
5. Lease-Purchase Agreement between Floyd and Gamble
6. Assignment of Interest in Purchase Agreement
7. Purchase agreement between Floyd and Driggers
8. McKenzie Loss Statement
9. Eviction Order of the Williamsburg County Magistrate Court dated March 6, 2013
10. Travelers Damage Estimate dated March 17, 2010
11. Settlement Agreement between Travelers and Arthur McKenzie
12. Deposition of Arthur McKenzie

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



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