

THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Alison R. Lee, Circuit Court Judge

RECEIVED

MAY 13 2013

SC Court of Appeals

Case No: 2012-212896

Charles Taylor,

Appellant,

v.

Thomas Davis and
State Farm Mutual Automobile Insurance Company, Respondents,

APPELLANT'S MOTION TO REQUIRE THE INDEMNITY INSURER ABOVE
POST A BOND FOR THE \$1,735,000.00 JUDGMENT PENDING THE APPEAL

Appellant move to require indemnity insurer Respondent State Farm to post a bond to cover the

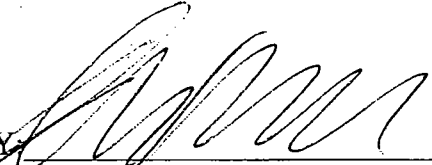
\$1,735,000.00 Judgment in this case and **the reasons are as follows:**

In light of the Court now adding State Farm Mutual Automobile Insurance Company as a named party (defendant) Respondent since 2/15/13 in this case, which would and should have been done earlier but for State Farm's false contentions that they could not be a named party defendant (R. p. 18); and because of such, they were not added until 2/15/13 by this court and;

That the end result of all the false contentions by Respondent State Farm is that they escaped, for that time before 2/15/13, being a named party defendant and responsible for the ultimate final \$1,735,000.00 judgment that they caused (R. p. 19, 20, 21, 22) and; **[R. Filed 4/23/13]**

Now that Indemnity Insurer-Respondent State Farm Mutual Automobile Insurance Company is properly added, Appellant move that they deposit with the Court, until the appeal concludes, a bond in sufficient amount to cover:

- (1). the present \$1,735,000.00 judgment (R.p.10 & p.9 L.4/5) (not subject the appeal),
- (2). plus costs,
- (3). plus interest,
- (4). plus the policy limits total of \$175,000.00;
- (5). Plus any other this court deems appropriate, fair and just, after 6 years of litigation.

BY 
Charles Taylor
Post Office Box 3652
Sumter, South Carolina 29151-3652
(803) 883-7005
For the Appellant/Pro-Se

Sumter, South Carolina

May 13, 2013

THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

APPEAL FROM RICHLAND COUNTY

Court of Common Pleas

Alison R. Lee, Circuit Court Judge

Appellate Case No: 2012-212896

RECEIVED

MAY 13 2013

SC Court of Appeals

Charles Taylor,

Appellant,

v.

Thomas Davis and
State Farm Mutual Automobile Insurance Company, Respondents,

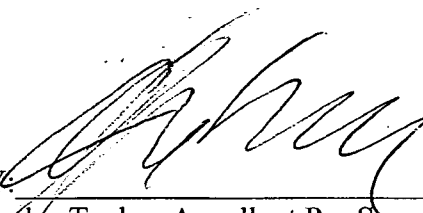
CERTIFICATE OF SERVICE

I hereby certify that a copy of: Appellant's Motion to Require the Indemnity Insurer Above Post a Bond for the \$1,735,000.00 Judgment Pending Appeal; was served upon the Respondent Thomas Davis & Respondent State Farm Mutual Automobile Insurance Company to its counsel listed below, by depositing same in the U.S. Mail, from Sumter, South Carolina, on the 13th day of April, 2013, with 1st class duly affixed postage and a return address indicated clearly thereon the envelope, addressed as follows:

Mr. Thomas Davis
PO Box 773
Manning, S.C. 29105
Respondent &

State Farm Mutual
Automobile Insurance Company, Respondent
c/o: Mr. James B. Lybrand, Jr., Esq.
PO Box 58
Columbia, S.C. 29202

Sumter, South Carolina

BY: 
Charles Taylor, Appellant Pro Se
Post Office Box 3652
Sumter, South Carolina 29151-3652
(803) 883-7005