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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Jean H. Toal, Circuit Court Judge

Case No. 2020-CP-40-02098
Appellate Case No. 2024-000674

Covil Corporation, by and
through its duly appointed
Receiver Peter D. Protopapas, Respondent,
v.

Pennsylvania National Mutual
Casualty Insurance Company; Sam J.
Crain & Co., Inc.; and South Carolina
Property and Casualty Insurance
Guaranty Association, Defendants,

Of which Pennsylvania National
Mutual Casualty Insurance Company
is the Appellant.

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

In addition to the items designated in Appellant's Designation of Matter filed on or about July 24, 2024, Appellant proposes that the following item be included in the Record on Appeal:

- Letter from Kirby D. Shealy III to Jon Robinson dated July 5, 2023 enclosing payment of \$671,693.00 in satisfaction of Order Granting Covil's Motion for Attorneys' Fees and Costs.

s/ Kirby D. Shealy III

Kirby D. Shealy III (S.C. Bar No. 11556)

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*Attorneys for Appellant Pennsylvania National
Mutual Casualty Insurance Co.*

October 1, 2024.

July 5, 2023

Via Hand Delivery

Jon Robinson, Esq.
Smith Robinson Holler Dubose Morgan, LLC
2530 Devine Street
Columbia, SC 29205

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Re: Covil Corporation v. Penn National Insurance
Case No. 2020-CP-40-02098
A&R File No. 050434-099883

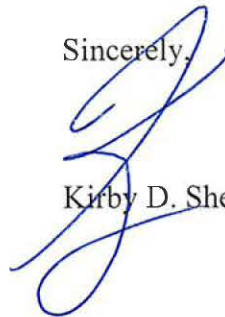
Dear Jon:

I have enclosed Penn National Insurance's check no. 2600054552 in the amount of \$671,693.00 pursuant to Judge Toal's Order Granting Coil's Motion for Attorneys' Fees and Costs entered in the referenced case. This check is made payable to your firm, per your instructions. We would ask that you hold these funds in trust until such time as Judge Toal's ruling is final. We anticipate appealing whenever it is appropriate to do so. If the ruling is overturned, we will seek to have these funds returned to Penn National Insurance.

I have also enclosed a Receipt and Satisfaction. Please sign and return the same in the provided self-addressed stamped envelope at your earliest convenience.

Please let me know if you have any questions.

Sincerely,



Kirby D. Shealy III

KDS/mg

Enclosures

Cc: Boyd Wright, CPCU, ARM-P, AIC, AMIM