

RECEIVED

Apr 14 2025

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM HORRY COUNTY
COURT OF COMMON PLEAS
THE HONORABLE B. ALEX HYMAN
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2024-000705
CIVIL ACTION NO. 2021-CP-26-00808

A. Tebele & Sons, a South Carolina General Partnership,

APPELLANT-RESPONDENT,

versus

Certain Underwriters at Lloyd's; HDI Global Specialty SE;
General Security Indemnity Company of Arizona; and Crescent
Coast Insurance, LLC,

RESPONDENTS,

Of which Crescent Coast Insurance, LLC is the

RESPONDENT-APPELLANT.

**RESPONDENT-APPELLANT CRESCENT COAST INSURANCE, LLC'S
ADDITIONAL DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Crescent Coast Insurance, LLC, Respondent-Appellant in the above referenced matter, proposes the following be included in the Record on Appeal:

1. Complaint, filed February 3, 2020;
2. Answers of Insurers, filed March 30, 2020;
3. Answer of Crescent Coast, filed May 8, 2020;
4. Crescent Coast Motion for Summary Judgment, filed November 22, 2023;

5. Crescent Coast Memorandum of Law in Support of Motion for Summary Judgment, filed November 30, 2023;
6. Transcript of Trial Held December 4 - 13, 2023 before The Honorable B. Alex Hyman (designated pages only): pp. 1-17, 97, 126-135, 164-192, 214, 231-272, 281, 292-449, 454-456, 460-461, 463, 489, 498-513, 517-520, 522, 524-546, 551-560, 624-627, 647-649, 651, 672-673, 682, 688-727, 733, 735-738, 745-747, 758-762, 767, 770, 772-773, 775, 782-784, 810-813, 816-820, 823-825, 834, 837-838, 852, 854, 861-872, 887-890, 895, 1053-1100, 1109-1139, 1141-1148, 1150-1153, 1182, 1203, 1212-1213, 1226-1227, 1250-1302, 1313, 1328, and 1335-1340;
7. Plaintiff's Ex. 9 (Acord application dated Aug. 20, 2018);
8. Plaintiff's Ex. 10 (E-mail to Sellers);
9. Plaintiff's Ex. 23 (Jan. 11, 2019 e-mail);
10. Plaintiff's Ex. 25 (Insurance application signed January 14, 2019);
11. Defendant's Ex. 25 (Insurance Binder);
12. Defendant's Ex. 28 (Jan. 17, 2019 e-mail from Egan to Tebele);
13. Defendant's Ex. 34 (Feb. 7, 2019 e-mail to Egan);
14. Defendant's Ex. 46 (Denial Letter);
15. Defendant's Ex. 55-E (April 5, 2019 e-mail);
16. Defendant's Ex. 55-F (Mar. 8, 2019 e-mail);
17. Defendant's Ex. 64 (Insurance Quote);
18. Defendant's. Ex. 109 (Jan. 30, 2019 e-mail requesting additions)
19. Deposition Transcript of Mark Melvin (designated pages only): pp. 8 and 63-64;
20. Verdict Form, filed December 19, 2023;
21. Plaintiff's Post-Trial Motion as to Insurers, filed December 21, 2023;
22. Plaintiff's Post-Trial Motion as to Crescent Coast, filed December 21, 2023;

23. Crescent Coast Memorandum in Opposition to Post-Trial Motion, filed January 10, 2024;
24. Order denying Post-Trial Motion as to Insurers, filed April 8, 2024; and
25. Order denying Post-Trial Motion as to Crescent Coast, filed April 8, 2024.

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

Respectfully submitted,

/s Carmen V. Ganjehsani

Caleb M. Riser (S.C. Bar No. 76738)
Carmen V. Ganjehsani (S.C. Bar No. 73515)
Hunter W. Adams (S.C. Bar No. 103526)
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400

criser@richardsonplowden.com

cganjehsani@richardsonplowden.com

hadams@richardsonplowden.com

**ATTORNEYS FOR RESPONDENT-
APPELLANT CRESCENT COAST
INSURANCE, LLC**

April 14, 2025.

RECEIVED

Apr 14 2025

SC Court of Appeals

CERTIFICATE OF SERVICE

I, the undersigned, an employee of Richardson Plowden & Robinson, P.A., for Respondent-Appellant, Crescent Coast Insurance, LLC, do hereby certify that I have this date served the foregoing Additional Designation of Matter to be Included in the Record on Appeal, dated April 14, 2025, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Amended Order dated April 24, 2024, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

William Wayne DesChamps, III
W. W. DesChamps, Jr.
DESCHAMPS LAW FIRM
1357 21St Ave. North Ste. 102
Myrtle Beach, SC 29577
trey@deschampsfirm.com
wwd@deschampsfirm.com

Gene McCain Connell, Jr.
KELAHHER CONNELL & CONNOR, PC
PO Drawer 14547
Surfside Beach, SC 29587
gconnell@classactlaw.net

Adam Sinclair Ruffin
RUFFIN LAW FIRM, LLC
1320 Main Street
Suite 300
Columbia, SC 292012941
adam@ruffinappeals.com
**Attorneys for Appellant-Respondent
A. Tebele & Sons**

Roman Creal Harper
Lewis Andrew Watson
BUTLER WEIHMULLER KATZ CRAIG LLP
11525 N. Community House Road
Suite 300
Charlotte, NC 28277
rharper@butler.legal
awatson@butler.legal

Mihaela Cabulea
BUTLER WEIHMULLER KATZ CRAIG LLP
400 North Ashley Drive, Suite 2300
Tampa, Florida 33602
mcabulea@butler.legal

Dominic Allen Starr
MCANGUS GOUDELOCK & COURIE, LLC
PO Box 1349
Myrtle Beach, SC 29578
dominic.starr@mgclaw.com
**Attorneys for Respondents Certain
Underwriters at Lloyd's; HDI Global
Specialty SE; and General Security
Indemnify Company of Arizona**

A copy of the sent email is enclosed with this Certificate of Service.

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani (S.C. Bar No. 73515)

RICHARDSON, PLOWDEN & ROBINSON, PA

1900 Barnwell Street (29201)

Post Office Drawer 7788

Columbia, South Carolina 29202

(803) 771-4400

ATTORNEYS FOR RESPONDENT-

APPELLANT CRESCENT COAST


INSURANCE, LLC

Dated: April 14, 2025.

From: [Carmen Ganjehsani](#)
To: awatson@butler.legal; dominic.starr@mgclaw.com; wwd@deschampsllaw.com; mcabulea@butler.legal; trey@deschampsllaw.com; gconnell@classactlaw.net; rharp@butler.legal; [Adam Ruffin](#)
Cc: [Caleb Riser](#); [Hunter Adams](#)
Subject: Appellate Case No. 2024-000705 Tebele v. Certain Underwriters et al.
Date: Monday, April 14, 2025 3:45:00 PM
Attachments: [2024-000705 Tebele v. Certain Underwriters et al \(Crescent Coast Int Res Brief\) \(3708716\).pdf](#)
[2024-000705 Tebele v. Certain Underwriters et al \(Crescent Coast Add'l DOM\) \(3708675\).pdf](#)

Please find served upon you the Initial Respondent's Brief and Additional Designation of Matter to be Included in the Record on Appeal on behalf of Respondent-Appellant Crescent Coast Insurance, LLC.

Thank you,
Carmen Ganjehsani

HOME	VCARD	LOCATION
		Carmen V. Ganjehsani Shareholder Cganjehsani@RichardsonPlowden.com Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com

The information contained in this e-mail message may be attorney-client privileged, attorney work product, or strictly confidential information. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of the communication is strictly prohibited. If you have received this communication in error, please immediately notify us by telephone at (803) 771-4400 and permanently delete this e-mail.