

**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.**

---

**DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

---

Certain Underwriters at Lloyd's, London; HDI Global Specialty SE; and General Security Indemnity Company of Arizona propose that the following be included in the Record on Appeal:

- 1) Complaint, filed February 2, 2020;
- 2) Answer of Underwriters at Lloyd's, London, filed March 20, 2020;
- 3) Answer of HDI Global Specialty SE, filed March 20, 2020;
- 4) Answer of General Security Indemnity Company of Arizona, filed March 20, 2020;
- 5) Answer of Crescent Coast, filed May 8, 2020;

- 6) Insurers' Motion for Summary Judgment, filed June 2, 2022;
- 7) Tebele & Sons' Motion for Partial Summary Judgment, filed May 10, 2022;
- 8) Tebele & Sons' Memorandum in Support of Motion for Summary Judgment, filed May 10, 2022;
- 9) Insurers' Consolidated Brief in Support of the Insurers' Motion for Summary Judgment and in Opposition to Plaintiff's Motion for Partial Summary Judgment, filed December 2, 2022;
- 10) Transcript of trial held December 4, 2023 through December 13, 2023 before the Honorable Alex Hyman, designated pages: 214, 231, 234-235, 237-238, 242-247, 264, 267-268, 272, 308, 337-339, 342, 345-346, 365, 390-391, 400-402, 410, 413-418, 423, 435, 441-442, 512-513, 529, 530-531, 536-539, 541, 543, 578, 583-586, 599-600, 647, 675, 686, 690-693, 695, 697-699, 700-704, 706-707, 712-718, 720-721, 725-727, 744-745, 753-755, 770, 772-773, 775, 782-784, 790, 811-813, 816-820, 823-825, 837-838, 854, 859-862, 867-869, 887, 890, 895, 904-905, 966, 971-972, 1054-1056, 1168-1172, 1189-1190, 1335-1337;
- 11) Plaintiff's Ex. 1 (Certified Deed);
- 12) Plaintiff's Ex. 2 (Certified Deed);
- 13) Defendant's Ex. 1 (Amendment to Commercial Lease, Initial Lease);
- 14) Defendant's Ex. 14 (SOV);
- 15) Defendant's Ex. 23 (August 20, 2018, Acord Application);
- 16) Defendant's Ex. 25 (Insurance Binder);
- 17) Defendant's Ex. 27 (January 15, 2019, email);
- 18) Defendant's Ex. 28 (Jan. 17, 2019, email);
- 19) Defendant's Ex. 29 (Jan. 31, 2019, email);
- 20) Defendant's Ex. 31 (Policy);
- 21) Defendant's Ex. 34 (Feb. 7, 2019 email);
- 22) Defendants' Exhibit 35, p. 11 (Crawford photos);
- 23) Defendant's Ex. 46 (Declination Letter);
- 24) Defendant's Ex. 64 (Insurance Quote);
- 25) Defendants' Ex. 103 (endorsement showing inclusion of new property added to policy by Insureds);

- 26) Defendant's Ex. 109 (Jan. 30, 2019 e-mail requesting additions);
- 27) Deposition Transcript of Mark Melvin, designated pages only: 8, 13-14, 24-25, 32, 49-50, 52-53, 58-59, 63-64;
- 28) Verdict Form, filed December 19, 2023;
- 29) Tebele & Sons' Motion for a New Trial Absolute or Nisi Additur, and NJOV, filed December 21, 2023;
- 30) Tebele & Sons' Amended Motion for a New Trial Absolute or Nisi Additur, and NJOV, filed December 27, 2023;
- 31) Insurers' Memorandum in Opposition to Tebele & Sons' Amended Motion for a New Trial Absolute or Nisi Additur, and NJOV, filed January 10, 2023;
- 32) Final Form 4 Order Denying Post-trial Motions as to Insurers, issued April 8, 2024;;
- 33) Final Form 4 Order Denying Post-Trial Motions as to Crescent Coast, issued April 8, 2024;
- 34) Deposition of Mr. Tebele, taken October 26, 2021, designated pages: 11, 74-75;
- 35) Transcript of the Examination Under Oath of Mr. Abraham Tebele, taken February 24, 2019, designated pages: 19-20;
- 36) Crescent Coast Insurance, LLC's Answers to HDI Global Specialty SE's Second Requests for Admission, Response no. 11.

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

BUTLER WEIHMULLER KATZ CRAIG, LLP

/s/ Mihaela Cabulea  
MIHAELA CABULEA  
*Pro Hac Vice*  
mcabulea@butler.legal  
400 North Ashley Drive, Suite 2300  
Tampa, Florida 33602  
Telephone: (813) 281-1900  
Facsimile: (813) 281-0900  
*Counsel for Certain Underwriters at Lloyd's,  
HDI Global Specialty SE, and General Security  
Indemnity of Arizona*

L. ANDREW WATSON, ESQ  
SC Bar No. 100322  
awatson@butler.legal  
ROMAN C. HARPER, ESQ.  
SC Bar No. 104000  
rharper@butler.legal  
11525 N. Community House Road, Ste. 300  
Charlotte, North Carolina 28277  
*Counsel for Certain Underwriters at Lloyd's,  
HDI Global Specialty SE, and General Security  
Indemnity of Arizona*

and

Dominic Allen Starr  
MCANGUS GOUDELOCK & COURIE, LLC  
Post Office Box 1349  
Myrtle Beach, SC 29578  
dominic.starr@mgclaw.com  
*Counsel for Certain Underwriters at Lloyd's;  
HDI Global Specialty SE; and General*

This 14th day of April, 2025.

## Ronette Burnison

---

**From:** Ronette Burnison  
**Sent:** Monday, April 14, 2025 9:04 PM  
**To:** 'cganjehsani@richardsonplowden.com'; 'dominic.starr@mgclaw.com';  
'criser@richardsonplowden.com'; 'hadams@richardsonplowden.com';  
'adam@ruffinappeals.com'; 'gconnell@classactlaw.net'  
**Cc:** Andrew Watson; Mihaela Cabulea May; Roman Harper  
**Subject:** A. Tebele & Sons v. Certain Underwriters, et al. - Appellate Case No. 2024-000705 - Civil  
Action No. 2020-CP-26-00808  
**Attachments:** Initial Brief (A Teble and Sons).pdf; Designation of Matter to be Included in the  
Record.pdf

Attached please find served upon you Respondents' Initial Brief and Designation of Matter to be Included in the Record on behalf of Respondents, Certain Underwriters at Lloyd's, HDI Global Specialty SE, and General Security Indemnity Company of Arizona.

Thank you,  
Mihaela Cabulea

**Ronnie Burnison** Legal Assistant  
BUTLER WEIHMULLER KATZ CRAIG LLP  
400 N. Ashley Drive, Suite 2300 Tampa, FL 33602  
Direct 813.594.5681 Office 813.281.1900 Fax 813.281.0900  
[www.butler.legal](http://www.butler.legal) | [email](mailto:) | <vCard> | <location>

**BUTLER**  
Butler Wehmuller Katz Craig

*Celebrating 45 years!*