

RECEIVED
Oct 13 2025
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable B. Alex Hyman, Circuit Court Judge

Appellate Case No. 2024-000136
Case No. 2019-CP-40-06380

The Cincinnati Specialty Underwriters
Insurance Company,Appellant,

v.

Zapp Scooters Inc. d/b/a Zapp Ride
Share, Frank Scozzafava, and Michael
Holland, Respondents.

MOTION TO SUPPLEMENT RECORD ON APPEAL

Pursuant to Rule 212(b), Respondent Michael Holland (“Respondent Holland”) respectfully moves this Court for leave to supplement the Record on Appeal. Respondent Holland seeks to include the Richland County Fifth Judicial Circuit Public Index for the underlying declaratory judgment action in order to reflect the filing dates of the Complaint and Amended Complaint, the apparent lack of service of the Amended Complaint on Respondents Zapp Scooters, Inc. d/b/a Zapp Ride Share (“Zapp”) and Frank Scozzafava (“Scozzafava”), and the subsequent lack of Entry of Default against Respondents Zapp and Scozzafava. A copy of the public index is attached hereto. Respondent Holland proposes that he be granted leave to serve and file an Appendix to the Record on Appeal to include this additional matter. Counsel for Respondent

Holland has consulted with counsel for Appellant The Cincinnati Specialty Underwriters Insurance Company who does not consent to this Motion.

October 13, 2025

s/ Mary Harriet Moore
Andrew D. Gowdown (SC Bar #17222)
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Mary Harriet Moore (SC Bar #105312)
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Holland**

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**Attorneys for Appellant The Cincinnati Specialty
Underwriters Insurance Company**



Richland County Fifth Judicial Circuit Public Index



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[S.C. Judicial Department](#)
[Summary Ct Dockets](#)

<div style="border: 1px solid black; display: inline-block; padding: 2px 10px;">Switch View</div>					
Cincinnati Specialty Underwriters Insurance Company vs Zapp Scooters Inc , defendant, et al					
Case Number:	2019CP4006380	Court Agency:	Richland County Common Pleas	Filed Date:	11/13/2019
Case Type:	Common Pleas	Case Sub Type:	Contract/Other 199	File Type:	Non-Jury
Status:	Appeal	Assigned Judge:	Clerk Of Court C P, G S, And Family Court		
Disposition:		Disposition Date:		Disposition Judge:	
Original Source Doc:		Original Case #:			
Judgment Number:		Court Roster:			

Case Parties	Judgments	Tax Map Information	Associated Cases	Actions	Financials	
Name	Description	Type	Motion Roster	Begin Date	Completion Date	Documents
Cincinnati Specialty Underwriters Insurance Company	NEF(10-01-2024 11:18:01 AM) Appeal/Notice of Appeal to C...	Filing		10/01/2024-12:03		
Cincinnati Specialty Underwriters Insurance Company	Appeal/Notice of Appeal to Court of Appeals	Filing		10/01/2024-11:18		
Gowdown, Andrew D.	10/21/2024_NJ1_Roster/Notice of Case Roster Publication Sent	Action		09/30/2024-16:28		
Gottschall, Brandon Robert	10/21/2024_NJ1_Roster/Notice of Case Roster Publication Sent	Action		09/30/2024-16:28		
Moore, Mary Harriet	10/21/2024_NJ1_Roster/Notice of Case Roster Publication Sent	Action		09/30/2024-16:28		
Barrow, Mark Steven	10/21/2024_NJ1_Roster/Notice of Case Roster Publication Sent	Action		09/30/2024-16:28		
Cincinnati Specialty Underwriters Insurance Company	NEF(01-02-2024 08:39:34 AM) Order/Electronic Form 4	Filing		01/02/2024-08:39		
Cincinnati Specialty Underwriters Insurance Company	Electronic Form 4 Order On October 9, 2023, Plaintiff filed	Order		01/02/2024-08:39		
Holland, Michael	NEF(10-23-2023 05:27:09 PM) Response	Filing		10/24/2023-08:38		
Holland, Michael	Response In Opposition To Plaintiff's Motion To Reconsider	Filing		10/23/2023-17:27		
Cincinnati Specialty Underwriters	NEF(10-09-2023 12:53:00 PM) Motion/Reconsider	Filing		10/09/2023-13:03		













Insurance Company						
Cincinnati Specialty Underwriters Insurance Company	Motion/Reconsider	Motion		10/09/2023-12:53	01/02/2024-12:53	
Holland, Michael	NEF(09-29-2023 12:23:34 PM) Order/Summary Judgment	Filing		09/29/2023-12:23		
Holland, Michael	Order/Summary Judgment Granted as to Defendant Holland	Order		09/29/2023-12:23		
Barrow, Mark Steven	10/9/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		09/11/2023-16:45		
Moore, Mary Harriet	10/9/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		09/11/2023-16:45		
Gottschall, Brandon Robert	10/9/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		09/11/2023-16:45		
Gowdown, Andrew D.	10/9/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		09/11/2023-16:45		
Holland, Michael	NEF(09-07-2023 02:40:56 PM) Proposed Order/Summary Judgm...	Filing		09/07/2023-15:59		
Holland, Michael	Order/Order Cover Sheet \$25.00	Filing		09/07/2023-14:40		
Holland, Michael	NEF(09-06-2023 03:59:33 PM) Proposed Order/Summary Judgm...	Filing		09/06/2023-16:38		
Holland, Michael	Order/Order Cover Sheet \$25.00	Filing		09/06/2023-15:59		
Holland, Michael	NEF(08-07-2023 02:56:00 PM) Proposed Order/Scheduling Or...	Filing		08/07/2023-15:53		
Holland, Michael	NEF(08-07-2023 02:51:46 PM) Motion/Continuance	Filing		08/07/2023-15:52		
Holland, Michael	Order/Order Cover Sheet \$25.00	Filing		08/07/2023-14:56		
Holland, Michael	Motion/Continuance	Motion		08/07/2023-14:51		
Gowdown, Andrew D.	8/28/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		08/03/2023-16:55		
Gottschall, Brandon Robert	8/28/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		08/03/2023-16:55		
Moore, Mary Harriet	8/28/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		08/03/2023-16:55		
Barrow, Mark Steven	8/28/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		08/03/2023-16:55		
Cincinnati Specialty Underwriters Insurance Company	NEF(06-07-2023 03:19:19 PM) Order/Scheduling Order	Filing		06/07/2023-15:19		
Cincinnati Specialty Underwriters Insurance Company	Order/Scheduling Order/Trial not before August 28, 2023	Order		06/07/2023-15:19		
Cincinnati Specialty Underwriters Insurance Company	NEF(05-24-2023 02:53:50 PM) Motion/Continuance	Filing		05/25/2023-09:20		
Cincinnati Specialty Underwriters Insurance Company	Motion/Continuance	Motion		05/24/2023-14:53		
Holland, Michael	NEF(05-23-2023 03:19:48 PM) Response	Filing		05/23/2023-15:35		
Holland, Michael	Response to plaintiffs supplemental memorandum	Filing		05/23/2023-15:19		










Gowdown, Andrew D.	1/17/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		12/20/2022-09:34		
Gottschall, Brandon Robert	1/17/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		12/20/2022-09:34		
Moore, Mary Harriet	1/17/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		12/20/2022-09:34		
Barrow, Mark Steven	1/17/2023_NJ1_Roster/Notice of Case Roster Publication Sent	Action		12/20/2022-09:34		
Cincinnati Specialty Underwriters Insurance Company	NEF(11-14-2022 12:04:58 PM) Order/Compel	Filing		11/14/2022-12:05		
Cincinnati Specialty Underwriters Insurance Company	ORDER DENYING DEFENDANT HOLLAND'S MOTION TO DEEM REQUESTS TO	Order		11/14/2022-12:04		
Cincinnati Specialty Underwriters Insurance Company	NEF(11-09-2022 10:50:36 AM) Proposed Order/Compel	Filing		11/09/2022-10:56		
Cincinnati Specialty Underwriters Insurance Company	Order/Order Cover Sheet \$25.00	Filing		11/09/2022-10:50		
Holland, Michael	NEF(10-25-2022 02:32:19 PM) Proposed Order/Continuance	Filing		10/25/2022-14:44		
Holland, Michael	Order/Order Cover Sheet \$25.00	Filing		10/25/2022-14:32		
Holland, Michael	NEF(10-21-2022 05:12:18 PM) Motion/Continuance	Filing		10/24/2022-10:42		
Holland, Michael	NEF(10-21-2022 05:25:51 PM) Motion/Other	Filing		10/24/2022-09:22		
Holland, Michael	NEF(10-21-2022 05:07:51 PM) Motion/Summary Judgment	Filing		10/24/2022-08:30		
Holland, Michael	Motion/to Deem Requests for Admissions to be Admitted	Motion		10/21/2022-17:25	11/14/2022-17:25	
Holland, Michael	Motion/Continuance	Motion		10/21/2022-17:12		
Holland, Michael	Motion/Summary Judgment	Motion		10/21/2022-17:07	09/29/2023-17:07	
Murphy, John Robert	11/2/2022_MOTION_Roster/Notice of Motions Roster Publication	Action		10/11/2022-14:39		
Murphy, John Robert	11/2/2022_MOTION_Roster/Notice of Motions Roster Publication	Action		10/11/2022-14:39		
Gowdown, Andrew D.	11/2/2022_MOTION_Roster/Notice of Motions Roster Publication	Action		10/11/2022-14:39		
Gowdown, Andrew D.	11/2/2022_MOTION_Roster/Notice of Motions Roster Publication	Action		10/11/2022-14:39		
Moore, Mary Harriet	11/2/2022_MOTION_Roster/Notice of Motions Roster Publication	Action		10/11/2022-14:39		
Moore, Mary Harriet	11/2/2022_MOTION_Roster/Notice of Motions Roster Publication	Action		10/11/2022-14:39		
Gottschall, Brandon Robert	11/2/2022_MOTION_Roster/Notice of Motions Roster Publication	Action		10/11/2022-14:39		
Gottschall, Brandon Robert	11/2/2022_MOTION_Roster/Notice of Motions Roster Publication	Action		10/11/2022-14:39		
Holland, Michael	NEF(10-05-2022 08:43:05 AM) Letter/Letter	Filing		10/05/2022-08:48		
Holland, Michael	Letter/Email from Attorney regarding stay being lifted	Filing		10/05/2022-08:43		
Holland, Michael	NEF(09-22-2022 03:50:29 PM) Notice/Notice of Appearance	Filing		09/22/2022-15:51		

Holland, Michael	Notice/Notice of Appearance	Filing		09/22/2022-15:50		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-29-2021 10:06:23 AM) Order/Substitution Of Course...	Filing		09/29/2021-10:06		
Cincinnati Specialty Underwriters Insurance Company	Order/Substitution Of Counsel	Order		09/29/2021-10:06		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-27-2021 04:28:39 PM) Proposed Order/Substitution ...	Filing		09/28/2021-08:22		
Cincinnati Specialty Underwriters Insurance Company	Notice/Notice of Appearance	Filing		09/27/2021-16:28		
Cincinnati Specialty Underwriters Insurance Company	Order/Order Cover Sheet \$25.00	Filing		09/27/2021-16:28		
Holland, Michael	NEF(09-21-2021 03:08:29 PM) Motion/Compel	Filing		09/21/2021-15:20		
Holland, Michael	Motion/Compel Discovery Responses From Plaintiff	Motion		09/21/2021-15:08	10/27/2022-15:08	
Cincinnati Specialty Underwriters Insurance Company	NEF(09-09-2021 12:46:36 PM) Memo/Memo in Support	Filing		09/09/2021-13:03		
Cincinnati Specialty Underwriters Insurance Company	Memo/Memo in Support Of Its Motion For Summary Judgment	Filing		09/09/2021-12:46		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-09-2021 12:32:01 PM) Motion/Summary Judgment	Filing		09/09/2021-12:45		
Cincinnati Specialty Underwriters Insurance Company	Motion/Summary Judgment	Motion		09/09/2021-12:32	09/29/2023-12:32	
Holland, Michael	NEF(10-02-2020 04:31:38 PM) Answer/Answer To Amended Com...	Filing		10/05/2020-08:19		
Holland, Michael	Answer/Answer To Amended Complaint	Filing		10/02/2020-16:31		
Cincinnati Specialty Underwriters Insurance Company	NEF(10-02-2020 02:10:10 PM) Amended/Amended Summons And ...	Filing		10/02/2020-14:21		
Cincinnati Specialty Underwriters Insurance Company	Amended/Amended Summons And Complaint	Filing		10/02/2020-14:10		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-17-2020 10:37:15 AM) Order/Amend	Filing		09/17/2020-10:37		

Cincinnati Specialty Underwriters Insurance Company	Consent Order Granting Motion to Amend Complaint	Order		09/17/2020-10:37		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-17-2020 10:36:29 AM) Order/Stay	Filing		09/17/2020-10:36		
Cincinnati Specialty Underwriters Insurance Company	Consent Order Staying Case	Order		09/17/2020-10:36		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-16-2020 04:23:43 PM) Proposed Order/Stay	Filing		09/17/2020-07:41		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-16-2020 04:13:01 PM) Proposed Order/Amend	Filing		09/17/2020-07:39		
Cincinnati Specialty Underwriters Insurance Company	Order/Order Cover Sheet \$25.00	Filing		09/16/2020-16:23		
Cincinnati Specialty Underwriters Insurance Company	Order/Order Cover Sheet \$25.00	Filing		09/16/2020-16:13		
Murphy, John Robert	9/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action		09/09/2020-14:02		
Murphy, John Robert	9/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action		09/09/2020-14:02		
Gowdown, Andrew D.	9/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action		09/09/2020-14:02		
Gowdown, Andrew D.	9/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action		09/09/2020-14:02		
Caiello, Sarah Elizabeth	9/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action		09/09/2020-14:02		
Caiello, Sarah Elizabeth	9/22/2020_MOTION_Roster/Notice of Motions Roster Publication	Action		09/09/2020-14:02		
Cincinnati Specialty Underwriters Insurance Company	ADR/Notice of ADR	Action		09/03/2020-12:46		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-01-2020 03:04:01 PM) Motion/Other	Filing		09/02/2020-11:21		
Cincinnati Specialty Underwriters Insurance Company	NEF(09-01-2020 03:24:53 PM) Motion/Other	Filing		09/02/2020-09:19		
Cincinnati Specialty Underwriters Insurance Company	Motion For Leave To Amend Complaint	Motion		09/01/2020-15:24	09/17/2020-15:24	
Cincinnati Specialty Underwriters	Motion/For Leave to Amend Complaint	Motion		09/01/2020-15:04	09/17/2022-15:04	

Insurance Company						
Holland, Michael	NEF(08-24-2020 04:05:35 PM) Motion/Compel	Filing		08/24/2020-19:56		
Holland, Michael	Motion/Compel Discovery Responses From Plaintiff	Motion		08/24/2020-16:05	09/15/2020-16:05	
Murphy, John Robert	9/7/2020_NJ1_Roster/Notice of Case Roster Publication Sent	Action		08/21/2020-08:53		
Gowdown, Andrew D.	9/7/2020_NJ1_Roster/Notice of Case Roster Publication Sent	Action		08/21/2020-08:53		
Caiello, Sarah Elizabeth	9/7/2020_NJ1_Roster/Notice of Case Roster Publication Sent	Action		08/21/2020-08:53		
Cincinnati Specialty Underwriters Insurance Company	NEF(08-06-2020 09:25:30 AM) Order/Entry of Default	Filing		08/06/2020-09:25		
Cincinnati Specialty Underwriters Insurance Company	Order/Entry of Default	Order		08/06/2020-09:25		
Cincinnati Specialty Underwriters Insurance Company	NEF(08-04-2020 12:25:01 PM) Request/Request	Filing		08/04/2020-13:00		
Cincinnati Specialty Underwriters Insurance Company	NEF(08-04-2020 12:25:55 PM) Affidavit/Default	Filing		08/04/2020-12:50		
Cincinnati Specialty Underwriters Insurance Company	Affidavit/Default	Filing		08/04/2020-12:25		
Cincinnati Specialty Underwriters Insurance Company	Request/Request for Entry of Default as to Defendants Zapp S	Filing		08/04/2020-12:25		
Cincinnati Specialty Underwriters Insurance Company	NEF(07-14-2020 12:14:47 PM) Proposed Order/Entry of Defa...	Filing		07/15/2020-10:00		
Cincinnati Specialty Underwriters Insurance Company	NEF(07-14-2020 12:11:37 PM) Affidavit/Default	Filing		07/14/2020-12:30		
Cincinnati Specialty Underwriters Insurance Company	Order/Order Cover Sheet \$25.00	Filing		07/14/2020-12:14		
Cincinnati Specialty Underwriters Insurance Company	Affidavit/Default	Filing		07/14/2020-12:11		
Cincinnati Specialty Underwriters Insurance Company	NEF(06-25-2020 02:41:52 PM) Service/Declaration of Servi...	Filing		06/25/2020-14:55		
Cincinnati Specialty Underwriters	Service/Declaration of Service on Frank Scozzafava	Filing		06/25/2020-14:41		

Insurance Company						
Gowdown, Andrew D.	7/13/2020_NJ1_Roster/Notice of Case Roster Publication Sent	Action		06/24/2020-09:51		
Murphy, John Robert	7/13/2020_NJ1_Roster/Notice of Case Roster Publication Sent	Action		06/24/2020-09:51		
Caiello, Sarah Elizabeth	7/13/2020_NJ1_Roster/Notice of Case Roster Publication Sent	Action		06/24/2020-09:51		
Cincinnati Specialty Underwriters Insurance Company	ADR/Alternative Dispute Resolution (Workflow)	Action		06/10/2020-09:53	09/03/2020-09:53	
Cincinnati Specialty Underwriters Insurance Company	NEF(06-05-2020 12:46:33 PM) ADR/Notice of ADR	Filing		06/05/2020-12:46		
Cincinnati Specialty Underwriters Insurance Company	NEF(05-05-2020 01:28:39 PM) Order/Publication	Filing		05/05/2020-13:28		
Cincinnati Specialty Underwriters Insurance Company	Order/Publication	Order		05/05/2020-13:28		
Cincinnati Specialty Underwriters Insurance Company	NEF(05-04-2020 10:45:36 AM) Affidavit/Affidavit of	Filing		05/04/2020-10:50		
Cincinnati Specialty Underwriters Insurance Company	Affidavit For Service Of Process By Publication	Filing		05/04/2020-10:45		
Cincinnati Specialty Underwriters Insurance Company	NEF(05-04-2020 10:36:25 AM) Notice/Notice of Appearance	Filing		05/04/2020-10:36		
Cincinnati Specialty Underwriters Insurance Company	Notice/Notice of Appearance	Filing		05/04/2020-10:36		
Cincinnati Specialty Underwriters Insurance Company	NEF(04-27-2020 01:57:08 PM) Petition/Order Of Publicatio...	Filing		04/27/2020-14:15		
Cincinnati Specialty Underwriters Insurance Company	Petition/Order Of Publication	Filing		04/27/2020-13:57		 
Cincinnati Specialty Underwriters Insurance Company	NEF(04-27-2020 11:48:37 AM) Service/Affidavit of Non Ser...	Filing		04/27/2020-12:35		
Cincinnati Specialty Underwriters Insurance Company	Service/Affidavit of Non Service on Frank Scozzafava	Filing		04/27/2020-11:48		
Holland, Michael	NEF(01-31-2020 03:43:51 PM) Notice/Notice of Appearance	Filing		01/31/2020-15:54		

Holland, Michael	Notice/Notice of Appearance	Filing		01/31/2020-15:43		
Holland, Michael	Answer Of Michael Holland	Filing		01/31/2020-15:43		
Cincinnati Specialty Underwriters Insurance Company	NEF(01-17-2020 03:30:40 PM) Service/Certificate Of Servi...	Filing		01/17/2020-15:50		
Cincinnati Specialty Underwriters Insurance Company	Service/Acceptance From Sec of State on Zapp Scooters Inc	Filing		01/17/2020-15:30		
Cincinnati Specialty Underwriters Insurance Company	NEF(01-06-2020 08:28:17 AM) Service/Acceptance Of Servic...	Filing		01/06/2020-08:47		
Cincinnati Specialty Underwriters Insurance Company	Service/Acceptance Of Service on Michael Holland	Filing		01/06/2020-08:28		
Cincinnati Specialty Underwriters Insurance Company	Summons & Complaint	Filing		11/13/2019-09:53		   

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Oct 13 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable B. Alex Hyman, Circuit Court Judge

Appellate Case No. 2024-000136
Case No. 2019-CP-40-06380

The Cincinnati Specialty Underwriters
Insurance Company,Appellant,

v.

Zapp Scooters Inc. d/b/a Zapp Ride
Share, Frank Scozzafava, and Michael
Holland,..... Respondents.

PROOF OF SERVICE

I, the undersigned of the law office of Rosen Hagood, LLC, attorneys for Respondent Michael Holland, do hereby certify that I have caused to be served all parties to this appeal by email copy of the Motion to Supplement Record on Appeal, which copy has been emailed to the addresses below:

Parties Served:

- Aaron J. Hayes, Esquire (ajh@swblaw.com)
- Mark S. Barrow, Esquire (msb@swblaw.com)
- Madison K. Kea, Esquire (mkk@swblaw.com)

October 13, 2025

s/ Mary Harriet Moore

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