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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable Charles J. McCutchen, Circuit Court Judge
The Honorable Dale E. Van Slambrook, Circuit Court Judge

Civil Action No.: 2025-CP-08-00820

Appellate Case No.: 2026-000301

Richard Kenneth Weatherford, Jr..... Respondent,

v.

Progressive Direct Insurance Company..... Third Party
of which Progressive Direct Insurance Company is the Appellant.

**RESPONDENT'S COUNTER-DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 210(c), SCACR, Respondent Richard Kenneth Weatherford, Jr., through undersigned counsel, respectfully submits this Counter-Designation of Matter to Be Included in the Record on Appeal. Respondent designates the following items for inclusion in addition to those identified in Appellant's Designation of Matter.

1. Order Granting Plaintiff's Motion to Compel, *Dalton Douglas Brown v. Lillie Katheryn Owens*, C.A. No. 2022-CP-39-01116, Pickens County Court of Common Pleas, signed September 27, 2023 (Kinlaw, J.)
 - Previously submitted to Trial Court in the underlying proceeding and attached as Exhibit A to Plaintiff's Supplemental Memorandum in Support of Rule to Show Cause, filed August 13, 2025.
2. Order Compelling Sedgwick Claims Management Services, Inc.'s Production of Claim File Materials, *Sharlene Moulton v. Lowe's Home Centers, LLC d/b/a James Island Lowe's Store #0661 and Donald Ray Donkle, Jr.*, C.A. No. 2023-CP-10-05684, Charleston County Court of Common Pleas, signed November 20, 2024 (Van Slambrook, J.)
 - Previously submitted to Trial Court in the underlying proceeding and attached as Exhibit B to Plaintiff's Supplemental Memorandum in Support of Rule to Show Cause, filed August 13, 2025.
3. Order Denying Defendant's Motion for Protective Order, *Yvonne Barnes v. Charles Hodges*, Case No. 2019-CP-15-00451, Colleton County Court of Common Pleas, signed January 7, 2020 (Goodstein, J.)
 - Previously submitted to Trial Court in the underlying proceeding and attached as Exhibit C to Plaintiff's Supplemental Memorandum in Support of Rule to Show Cause, filed August 13, 2025.
4. Order Compelling Adjuster's File, *Gerald Richey and Sarah Richey v. Styles*, Case No. 2019-CP-18-00261, Dorchester County Court of Common Pleas, signed November 16, 2020 (Murphy, J.)
 - Previously submitted to Trial Court in the underlying proceeding and attached as Exhibit D to Plaintiff's Supplemental Memorandum in Support of Rule to Show Cause, filed August 13, 2025.
5. Order Compelling Production of Claim File Materials, *David Richard Currie v. Stuart Lee Lackey, Jr.*, Case No. 2024-CP-08-02427, Berkeley County Court of Common Pleas, signed June 9, 2025 (Culbertson, J.)
 - Previously submitted to trial court in the underlying proceeding and attached to Respondent's Letter addressing Progressive's Supplemental Authority filed September 18, 2025

Pursuant to Rule 209(c), SCRAP, I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully Submitted,

s/Trip Riesen, SC Bar #71084
RIESEN DURANT, LLC
613 Long Point Road, Suite 100
Mount Pleasant, SC 29464
Phone: 843-800-0809
trip@riesendurant.com

*Attorney for Respondent,
Richard Kenneth Weatherford, Jr*

July 1, 2026
Mount Pleasant, SC