

STATE OF SOUTH CAROLINA)
) IN THE COURT OF COMMON PLEAS
COUNTY OF Charleston)
)
NATIONWIDE PROPERTY &)
CASUALTYINSURANCE COMPANY) Case No.:2013CP107203
)

PLAINTIFF,
vs.)
)
GARY MCCOMBS)
)
RAGAN MCCOMBS ALBERT)
)
DEFENDANT (s) .

BY
JULIE J. ARMSTRONG
CLERK OF COURT
**AMENDED COMPLAINT
NEGLIGENCE**

2014 FEB 19 PM 3:00
FILED

Comes now PLAINTIFF, NATIONWIDE PROPERTY & CASUALTY
INSURANCE COMPANY, and for its Complaint states:

Jurisdiction and Venue

1. The PLAINTIFF, NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY, (hereinafter "PLAINTIFF,") is a foreign corporation.
2. On information and belief, the Defendant(s), GARY MCCOMBS (hereinafter "Defendant(s)") is citizen and resident of the above named County, State of South Carolina, who resides at 1282 CHRISMILL LANE , MOUNT PLEASANT SC 29466.
3. On information and belief, the Defendant(s), RAGAN MCCOMBS ALBERT (hereinafter "Defendant(s)") is citizen and resident of the above named County, State of South Carolina, who resides at 1282 CHRISMILL LANE , MOUNT PLEASANT SC 29466.

Facts:

4. Defendant(s) ROBERT ALBERT AND REGAN MCCOMBS ALBERT owned a rental property.
5. Plaintiff's insured owned property directly below the Defendant(s) property.
6. Due to Defendants Negligence, Plaintiff insured's property was damaged from water coming form Defendant's property, on or about December 2011.
7. The total amount of the damage caused is \$18,923.91 as evidenced in the attached photographs and documentation of estimated costs for repairs (Exhibit A, B and C). These document detail the address, date of loss, and other pertinent information in addition to the detailing the costs and details of the damage and repair the property.
8. Defendant(s) is not insured for this damage and has not provided payment for the cost of the damages.

Count One: Negligence

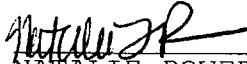
9. PLAINTIFF realleges the foregoing paragraphs as if fully set forth and is incorporated herein by reference.
10. Defendant has a duty, among other duties, to keep his unit in such a fashion that his plumbing and fixtures do not leak onto the unit below. Defendant has failed to maintain his property and has thus breach his duty to the below property owners.

11. Defendant(s) has negligently caused harm to Plaintiff as alleged above through his behavior or lack of behavior which caused water damage, and other damage to the Plaintiff's Insured's property.
12. Plaintiff has suffered damages due to Defendant's negligence as described above.

Wherefore, PLAINTIFF prays that it be granted judgment for the following amounts:

- 1) For Count One, Negligence, PLAINTIFF prays that it be granted \$18,923.91 in principal, \$5,144.46 in prejudgment interest from December 17, 2010 through January 24, 2014, court costs and post judgment interest at the legal rate.

This 18 day of February, 2014.


NATALIE POWERS or TRACE DILLON
Bar No. 80705 or 16857
Attorney for PLAINTIFF
THE DILLON LAW FIRM PC
1130 Hurricane Shoals Rd
Suite 600
Lawrenceville, GA 30043
(770) 513-6400 (Office)
(770) 513-6577 (Facsimile)

or incomplete when made, or that a response, thought correct and complete when made, is no longer true and complete. A failure to deny the attached Requests for Admission, within the time permitted by law, will be deemed an admission pursuant to S. C. R. Civ. P. 36.

INSTRUCTIONS AND DEFINITIONS

For the purposes of these Requests the following definitions and instructions shall apply:

- A) For purposes of these requests, "**document**" or "**documents**" is used in its broadest sense, and means all tangible items and all written, printed, typed, recorded, transcribed, punched, taped, or graphic matter of every type and description, however and by whomever prepared, produced, reproduced, disseminated, or made, including, but not limited to, writings, records, correspondence, communications, letters, diaries, diary entries, logs, log books, schedules, change orders, contracts, purchase orders, delivery tickets, cost reports, payroll ledgers, telegrams, telexes, memoranda, notes, reports, bulletins, summaries, or other records of telephone or personal conversations, minutes or summaries of telephone or personal meetings and conferences, instructions, literature, work assignments, agreements, subcontracts, interoffice or intra office communications, electronic mail, microfilm, notebooks, calendars, appointment books,

circulars, pamphlets, projections, studies, estimates, charts, lists, tables, computer runs, tabulations, printouts, notices, books, checks, credit card vouchers, statements of account, receipts, invoices, graphs, photographs, photocopies, drafts, data sheets, data compilations, computer data compilations, statistics, worksheets, speeches or other writings, and tape recordings, and means the original, copy, or any non-identical copy or draft version, regardless of origin or location, which is within the scope of Rule 34 S.C. R. Civ. P.

- B) **"You"** or **"your"** means, and the attorneys, representatives, and agents of same.
- C) **"Identify"** or **"identity"** as used in these Requests in connection with any person or persons requires the following information for each person:
- i) the person's full name;
 - ii) the person's last known business address and telephone number;
 - iii) the person's last known home address and telephone number;
 - iv) the person's last known employer; and
 - v) the person's last known title, position, or business.

- D) **"Identify"** or **"identity"** as used in these Requests in connection with any tangible item or thing requires the following information for each:
- i) a detailed description of the item or thing; and
 - ii) the present location of the item or thing.
- E) **"Describe"** as used in these Requests in connection with any act, occurrence, omission, or series of acts, occurrences or omissions requires the following information:
- i) the identity of each and every person involved in the act, occurrence, omission or series of acts, occurrences or omissions as provided in the definition of "identify;"
 - ii) the date or dates of each and every act, occurrence or omission;
 - iii) a brief description of the act, occurrence, omission, or series of acts, occurrences or omissions and the substance of any contact or communication in connection therewith; and
 - iv) a description of each and every document involved in the act, occurrence, omission or series of acts, occurrences or omissions.
- F) **"Specify"** or **"identify"** as used in these Requests in connection with any document requires the following information for each document:

- i) the title of the document with sufficient particularity to permit its identification;
- ii) the name, position of employment or title and business address of each person who prepared or participated in the preparation of each document;
- iii) the date on which each document was prepared;
- iv) the identity of each person who received or obtained a copy of each document; and
- v) if all copies of the document have been destroyed, identify the person or persons authorizing the destruction of the document and the date of the destruction of the document.

In lieu of specifying documents, may, at its option, attach such documents to the answers to these Requests.

- G) "**Relative to**" or "**related to**" as used in these Requests shall be construed in its broadest sense to mean directly or indirectly describing, setting forth, referring to, concerning, addressing, alluding to, responding to, connected with, arising from, mentioning, commenting on, supporting, contradicting, summarizing, showing, describing, reflecting, analyzing, constituting, or in any way relevant to the specified subject, whether in whole or in part.
- H) "**Person**" and "**persons**" as used in these Requests means any individual or natural person, firm, partnership,

corporation, committee, association, governmental body, agency or subdivision, political action group or any other organization or entity.

- I) **"Contact"** or **"communication"** shall mean all modes of conveying meaning or information including, without limitation, telephone, telegraph, written or spoken language between two persons.
- J) **"Complaint"** shall mean the complaint filed by the Plaintiff in this action.
- K) **"Answer"** shall mean the answer filed by the Defendant(s) in this action.
- L) **"Pleadings"** shall mean the Complaint, Answer, and all other Motions and Petitions filed by the parties in this action.
- M) Irrespective of whether you consider a document privileged or subject to any claim of privilege, please provide the following information:
 - (a) Title or other means of identification of each document;
 - (b) The date of the document, if dated;
 - (c) A general description of the length and subject matter of the document;
 - (d) The name, address, telephone number, and employer of the author or person who created, prepared, compiled or otherwise authorized the documents;

- (e) The name, address, and telephone number of the person or persons who have custody or control of the original and/or copy of each document;
 - (f) Any privilege claimed with respect to the document, the nature of such privilege, and each and every fact supporting the purported claim(s) of privilege.
- N) The singular form of a word shall also be interpreted as its plural as would bring within the scope of these Discovery Requests and information that might otherwise be construed to be outside its scope.
- O) The terms "and" as well as "or" shall be construed either conjunctively or disjunctively as would bring within the scope of these Discovery Requests and information that might otherwise be construed to be outside its scope.

INTERROGATORIES

- 1) Give the names and addresses of persons known to you or your counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.
- 2) Set forth a list of photographs, plats, sketches or other prepared documents in your or your counsel's possession or control that relate to your claims and defenses in the case.

- 3) List the names and addresses of any expert witnesses whom Defendant(s) proposes to use as a witness at the trial of the case.
- 4) For each person known to the Defendant(s) or Counsel for the Defendant(s) to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.
- 5) Please identify the person(s) responding to these interrogatories and requests.

REQUEST FOR PRODUCTION OF DOCUMENTS

- 1) All documents identified in your Responses to the foregoing Interrogatories or the following Request for Admissions.
- 2) All statements in Defendant(s)'s possession whether written or oral, relating to the subject of this suit.
- 3) Copies of any documents relied upon by you in drafting your pleading and that you claim supports your claims and defenses and contradicts the assertions in the pleadings of PLAINTIFF.
- 4) Copies of all documents you or your counsel intend to present at trial or that you or your counsel rely upon in preparing for hearings or the trial of this case.
- 5) For each expert you have contacted, whether or not employed by you or your counsel, please produce for each:

- A) A copy of such person's most recent curriculum vitae or resume outlining such person's address, phone number, current occupation, expertise, educational background, and such person's current and former employers for the past ten (10) years;
- B) Any documents reviewed by such person related to this case;
- C) Any reports or notes created or generated by such person;
- D) Any documents that you, your counsel, or such person contends supports such person's position; and
- E) Any documents that you, your counsel, or such person contends supports such person being qualified as an expert in this case.

Submitted this _____ day of _____, 20____.

NATALIE POWERS or TRACE DILLON
Bar No. 80705 or 16857
Attorney for PLAINTIFF
THE DILLON LAW FIRM PC
1130 Hurricane Shoals Rd
Suite 600
Lawrenceville, GA 30043
(770) 513-6400 (Office)
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KAUFMANN RENOVATIONS llc

1465 PINE ISLAND VIEW
 MT.PLEASANT S.C. 29464
 (843) 568-1650 Fax.(843) 856-7310
 dave.kaufmann@gmail

Estimate Cost Report by Area

Customer Information

Cris Thronley
 1515 Cambridge Lakes
 Mt.Pleasant, SC 29464

Cust# 790
 Home (843) 469-7854
 Mobile (843) 270-3327

Nationwide Ins Co.

Project Information

Proj Name Water damage
 Proj Type Home Owner
 Dave Kaufmann

Project# 1136
 Contact # (843) 568-1650

Estimate Information

Date Tuesday, December 28, 2010

Terms: No Money Down, payment due in full upon completion, Unless other arrangements are made.

Description	QTY	U/M	Material	Labor	Subcontract	Equipment	Cost
Finish Carpentry							
Supply & Install Baseboard / partial	16	LF	1.00	1.50	0.00	0.00	40.00
Int Painting							
Cover & Protect	135.63	Sf	0.09	0.07	0.00	0.00	21.70
Paint Base Mld	40	LF	0.20	0.65	0.00	0.00	34.00
Paint Wall(S)	377	SF	0.15	0.45	0.00	0.00	226.20
Prime Wall(S) / partial	100	SF	0.10	0.20	0.00	0.00	30.00
Walls, Drywall							
Spray Knockdown wall texture, blending into existing.	100	Sf	0.20	0.85	0.00	0.00	105.00
Area Sub Total (Excludes all Markups)			122.76	568.25	1,331.65	0.00	2,022.65
Bed #1 cl 6x2x9 :							
Carper & Pad							
Carpet, remove	1.33	Sy	0.00	1.50	0.00	0.00	2.00
Supply & Install Carpeting & Pad LKQ	1.33	SY	0.00	0.00	39.55	0.00	52.60
Remove & Reset Contents	1.5	LS	0.00	25.00	0.00	0.00	37.50
Ceiling, Drywall							
Wall / Drywall Labor Hours, due to trim being removed.	3	HR	0.00	58.00	0.00	0.00	174.00
Finish Carpentry							
Supply & Install Baseboard	12	LF	1.00	1.50	0.00	0.00	30.00
Int Painting							
Paint Base Mld	12	LF	0.20	0.65	0.00	0.00	10.20
Paint Wall(S)	109	SF	0.15	0.45	0.00	0.00	65.40
Walls, Drywall							
Spray knockdown wall texture, blending into existing.	30	Sf	0.20	0.85	0.00	0.00	31.50
Area Sub Total (Excludes all Markups)			36.75	313.65	52.60	0.00	403.20

Exhibit A

KAUFMANN RENOVATIONS IIC

1465 PINE ISLAND VIEW
 MT. PLEASANT S.C. 29464
 (843) 568-1650 Fax. (843) 856-7310
 dave.kaufmann@gmail

Estimate Cost Report by Area

Customer Information		Project Information	
Cris Thronley	Cust# 790	Proj Name Water damage	Project# 1136
1515 Cambridge Lakes	Home (843) 469-7854	Proj Type Home Owner	Contact # (843) 568-1650
Mt. Pleasant, SC 29464	Mobile (843) 270-3327	Dave Kaufmann	
Nationwide Ins Co.			

Estimate Information Date Tuesday, December 28, 2010

Terms: No Money Down, payment due in full upon completion, Unless other arrangements are made.

Description	QTY	U/M	Material	Labor	Subcontract	Equipment	Cost
Misc. :							
Cabinets							
Cabinet Repair, Kitchen humidity caused cabinet to separate from wall.	1	LS	0.00	150.00	0.00	0.00	150.00
Demolition							
Hauling & Debris Removal	2	LS	0.00	125.00	0.00	0.00	250.00
Electrical							
Remove & Reset Fixtures / over head light in utility room.	1	EA	18.00	35.00	0.00	0.00	53.00
Misc.							
Shipping of carpet to / keep renter in as soon as possible.	1	Ea	0.00	0.00	120.00	0.00	120.00
Area Sub Total (Excludes all Markups)			18.00	435.00	120.00	0.00	573.00
Master Bedroom :							
Content Manipulation							
Content manipulation, hourly	2.5	Hr	0.00	26.00	0.00	0.00	65.00
Floor Covering							
Remove existing carpet & pad.	23.5	Sy	0.00	1.50	0.00	0.00	35.25
Supply & install Carpeting & Pad LKQ	23.5	Sy	0.00	0.00	39.55	0.00	929.43
Area Sub Total (Excludes all Markups)			0.00	100.25	929.43	0.00	1,029.68
Phase Sub Total (Excludes all Markups)			1,084.34	4,847.19	4,923.74	0.00	10,855.28

KAUFMANN RENOVATIONS llc

1465 PINE ISLAND VIEW
MT.PLEASANT S.C. 29464
(843) 568-1650 Fax.(843) 856-7310
dave.kaufmann@gmail

Estimate Cost
Report by Area

Customer Information

Cris Thronley
1515 Cambridge Lakes
Mt.Pleasant, SC 29464

Cust# 790
Home (843) 469-7854
Mobile (843) 270-3327

Nationwide Ins Co.

Project Information

Proj Name Water damage
Proj Type Home Owner
Dave Kaufmann

Project# 1136
Contact # (843) 568-1650

Estimate Information

Date Tuesday, December 28, 2010

Terms: No Money Down, payment due in full upon completion, Unless other arrangements are made.

Description	QTY	U/M	Material	Labor	Subcontract	Equipment	Cost
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Cost Summary (Excludes all Markups)			1,084.34	4,847.19	4,923.74	0.00	\$10,855.28
Profit & Overhead Summary			220.89	961.40	984.75	0.00	\$2,167.04
						Tax	\$97.89
						TOTAL	\$13,120.21



BOSS DISASTER RESTORATION

P.O. Box 731
Isle of Palms SC 29451
Office 843-884-2677
Fax 843-884-0677
Tax ID 57-1048595

Insured: Thomley, Allison
Property: 1515 Cambridge Lakes
Mt. Pleasant, SC 29464

Home: (843) 270-3327
Cellular: (843) 469-7854

Claim Rep.: Joe Miano
Company: Nationwide

Business: (843) 412-3797
Fax: (866) 563-8956
E-mail: mianoj@nationwide.com

Estimator: Boss Disaster Restoration

Business: (843) 884-2677

Claim Number: 0

Policy Number: 0

Type of Loss: Water Damage

Date Contacted: 12/17/2010

Date of Loss: 12/17/2010

Date Received: 12/17/2010 3:30 PM

Date Inspected: 12/17/2010

Date Entered: 1/10/2011 11:54 AM

Date Est. Completed: 1/10/2011 12:34 PM

Price List: SCCH7X_JAN11
Restoration/Service/Remodel

Estimate: 2011-01-10-1154

Water came from unit above.

Exhibit B



BOSS DISASTER RESTORATION

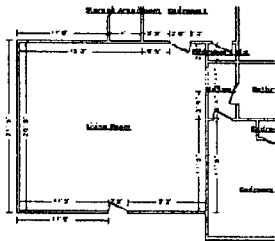
P.O. Box 731
 Isle of Palms SC 29451
 Office 843-884-2677
 Fax 843-884-0677
 Tax ID 57-1048595

2011-01-10-1154

Main Level

Main Level

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
31. Equipment setup, take down, and monitoring (hourly charge) - set-up @ 1 - Monitoring 12-20, 12-21, 12-22 @ .5 ea. (includes drive time) Takedown 12-23-10 @ 1 (includes drive time)	3.50 HR	0.00	37.40	130.90
32. Equip. setup, take down & monitoring - after hrs - monitoring 12-18, 12-19 @ .5 ea. (includes drive time)	1.00 HR	0.00	56.16	56.16
33. Haul debris - per pickup truck load - including dump fees	1.00 EA	87.12	0.00	87.12
34. Content Manipulation charge - per hour - 2 men @ 1 ea. to facilitate removing pad	2.00 HR	0.00	26.47	52.94
Total: Main Level				327.12



Living Room

Height: 9'

778.56 SF Walls	489.35 SF Ceiling
1,267.91 SF Walls & Ceiling	489.35 SF Floor
54.37 SY Flooring	85.75 LF Floor Perimeter
88.67 LF Ceil. Perimeter	

Missing Wall: 1 - 2' 11" X 6' 8"

Opens into HALL

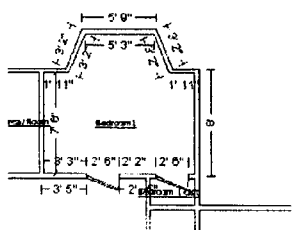
Goes to Floor

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
6. Water extraction from floor - Weight-assisted	184.00 SF	0.00	0.85	156.40
4. Tear out trim/base and bag for disposal	20.00 LF	0.62	0.00	12.40
3. Tear out wet carpet pad and bag for disposal - 23x8 -	184.00 SF	0.34	0.00	62.56
28. Lift carpet for drying	184.00 SF	0.00	0.27	49.68
1. Dehumidifier (per 24 hour period) - XLarge - No monitoring - 12-17 thru 12-23-10 - billed 5 days	5.00 EA	0.00	101.25	506.25
2. Air mover (per 24 hour period) - No monitoring - 4 installed 12-17 thru 12-23-10 - billed 5 days	20.00 EA	0.00	27.16	543.20

P.O. Box 731
Isle of Palms SC 29451
Office 843-884-2677
Fax 843-884-0677
Tax ID 57-1048595

CONTINUED - Living Room

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
Totals: Living Room				1,330.49



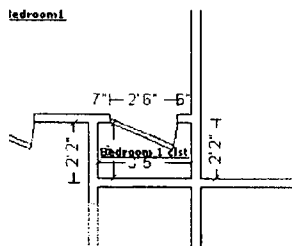
Bedroom 1

Height: 9'

377.08 SF Walls	105.17 SF Ceiling
482.25 SF Walls & Ceiling	105.17 SF Floor
11.69 SY Flooring	41.90 LF Floor Perimeter
41.90 LF Ceil. Perimeter	

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
5. Water extraction from floor - Weight-assisted	105.17 SF	0.00	0.85	89.39
7. Tear out wet carpet pad and bag for disposal	105.17 SF	0.34	0.00	35.76
27. Lift carpet for drying	105.17 SF	0.00	0.27	28.40
8. Tear out trim/base and bag for disposal	41.90 LF	0.62	0.00	25.98
21. Air mover (per 24 hour period) - No monitoring - 4 installed 12-17 thru 12-23-10 - billed for 5 days	20.00 EA	0.00	27.16	543.20
25. Dehumidifier (per 24 hour period) - XLarge - No monitoring - 12-17 thru 12-23-10 - billed 5 days	5.00 EA	0.00	101.25	506.25

Totals: Bedroom 1				1,228.98
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Bedroom 1 clst

Height: 9'

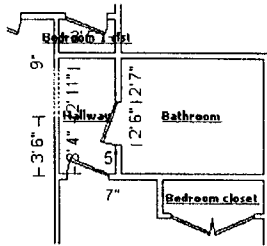
97.50 SF Walls	6.83 SF Ceiling
104.33 SF Walls & Ceiling	6.83 SF Floor
0.76 SY Flooring	10.83 LF Floor Perimeter
10.83 LF Ceil. Perimeter	

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
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P.O. Box 731
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Office 843-884-2677
Fax 843-884-0677
Tax ID 57-1048595

CONTINUED - Bedroom 1 clst

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
9. Water extraction from floor - Weight-assisted	6.83 SF	0.00	0.85	5.81
10. Tear out wet carpet pad and bag for disposal	6.83 SF	0.34	0.00	2.32
20. Tear out trim/base and bag for disposal	10.83 LF	0.62	0.00	6.71
Totals: Bedroom 1 clst				14.84



Hallway

Height: 9'

165.06 SF Walls	23.35 SF Ceiling
188.40 SF Walls & Ceiling	23.35 SF Floor
2.59 SY Flooring	17.58 LF Floor Perimeter
20.50 LF Ceil. Perimeter	

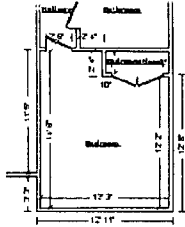
Missing Wall: 1 - 2' 11" X 6' 8"

Opens into LIVING

Goes to Floor

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
11. Water extraction from floor - Weight-assisted	23.35 SF	0.00	0.85	19.85
29. Lift carpet for drying	23.35 SF	0.00	0.27	6.30
12. Tear out wet carpet pad and bag for disposal	23.35 SF	0.34	0.00	7.94
19. Tear out trim/base and bag for disposal	17.58 LF	0.62	0.00	10.90
23. Air mover (per 24 hour period) - No monitoring - 1 installed 12-17 thru 12-23-10 - billed 5 days	5.00 EA	0.00	27.16	135.80
Totals: Hallway				180.79

P.O. Box 731
Isle of Palms SC 29451
Office 843-884-2677
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Tax ID 57-1048595

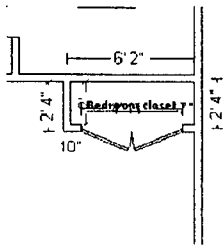


Bedroom

Height: 9'

481.50 SF Walls	162.85 SF Ceiling
644.35 SF Walls & Ceiling	162.85 SF Floor
18.09 SY Flooring	53.50 LF Floor Perimeter
53.50 LF Ceil. Perimeter	

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
13. Water extraction from floor - Weight-assisted	90.00 SF	0.00	0.85	76.50
14. Tear out wet carpet pad and bag for disposal	90.00 SF	0.34	0.00	30.60
30. Lift carpet for drying	90.00 SF	0.00	0.27	24.30
18. Tear out trim/base and bag for disposal	15.00 LF	0.62	0.00	9.30
22. Air mover (per 24 hour period) - No monitoring - 4 installed 12-18 thru 12-23-10 - billed 5 days	20.00 EA	0.00	27.16	543.20
26. Dehumidifier (per 24 hour period) - XLarge - No monitoring - 12-17 thru 12-23-10 - billed 5 days	5.00 EA	0.00	101.25	506.25
Totals: Bedroom				1,190.15



Bedroom closet

Height: 9'

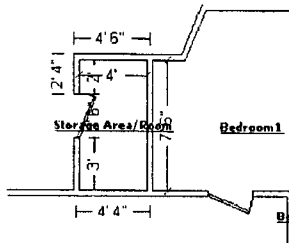
144.00 SF Walls	12.00 SF Ceiling
156.00 SF Walls & Ceiling	12.00 SF Floor
1.33 SY Flooring	16.00 LF Floor Perimeter
16.00 LF Ceil. Perimeter	

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
15. Water extraction from floor - Weight-assisted	12.00 SF	0.00	0.85	10.20
16. Tear out wet carpet pad and bag for disposal	12.00 SF	0.34	0.00	4.08
17. Tear out trim/base and bag for disposal	16.00 LF	0.62	0.00	9.92
Totals: Bedroom closet				24.20



BOSS DISASTER RESTORATION

P.O. Box 731
 Isle of Palms SC 29451
 Office 843-884-2677
 Fax 843-884-0677
 Tax ID 57-1048595



Storage Area/Room

Height: 9'

207.00 SF Walls	30.00 SF Ceiling
237.00 SF Walls & Ceiling	30.00 SF Floor
3.33 SY Flooring	23.00 LF Floor Perimeter
23.00 LF Ceil. Perimeter	

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
24. Dehumidifier (per 24 hour period) - Large - No monitoring - 1 installed 12-17 thru 12-27 - billed 5 days	5.00 EA	0.00	71.00	355.00
Totals: Storage Area/Room				355.00
Total: Main Level				4,651.57
Line Item Totals: 2011-01-10-1154				4,651.57

Grand Total Areas:

2,526.69 SF Walls	887.63 SF Ceiling	3,414.32 SF Walls and Ceiling
887.63 SF Floor	98.63 SY Flooring	279.23 LF Floor Perimeter
0.00 SF Long Wall	0.00 SF Short Wall	285.06 LF Ceil. Perimeter
887.63 Floor Area	959.68 Total Area	2,526.69 Interior Wall Area
1,425.64 Exterior Wall Area	142.56 Exterior Perimeter of Walls	
0.00 Surface Area	0.00 Number of Squares	0.00 Total Perimeter Length
0.00 Total Ridge Length	0.00 Total Hip Length	



BOSS DISASTER RESTORATION

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Tax ID 57-1048595

Summary for Dwelling

Line Item Total				4,651.57
Material Sales Tax	@	7.500% x	28.42	2.13
Replacement Cost Value				\$4,653.70
Net Claim				\$4,653.70

Boss Disaster Restoration



BOSS DISASTER RESTORATION

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Tax ID 57-1048595

Recap by Room

Estimate: 2011-01-10-1154

Area: Main Level	327.12	7.03%
Living Room	1,330.49	28.60%
Bedroom1	1,228.98	26.42%
Bedroom 1 clst	14.84	0.32%
Hallway	180.79	3.89%
Bedroom	1,190.15	25.59%
Bedroom closet	24.20	0.52%
Storage Area/Room	355.00	7.63%
<hr/>		
Area Subtotal: Main Level	4,651.57	100.00%
<hr/>		
Subtotal of Areas	4,651.57	100.00%
<hr/>		
Total	4,651.57	100.00%

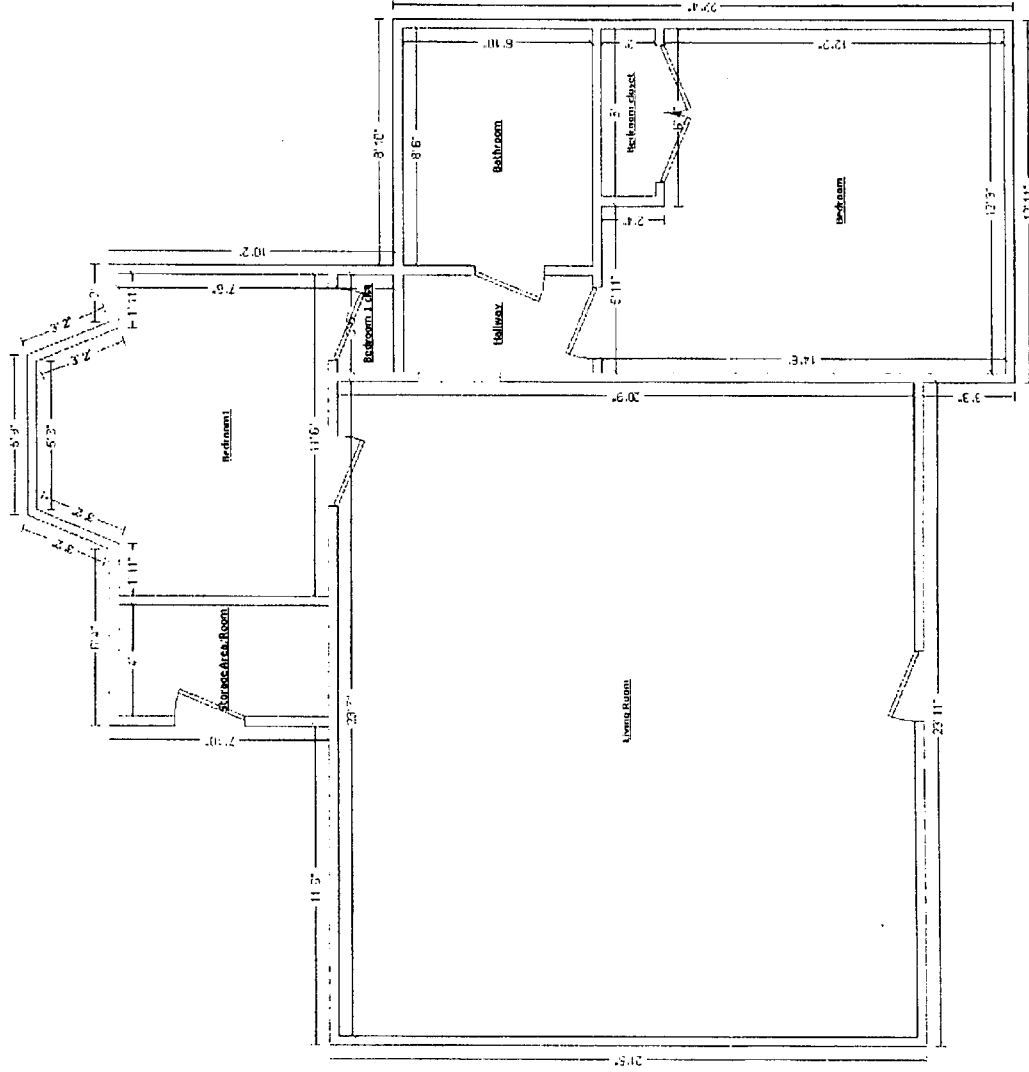


BOSS DISASTER RESTORATION

P.O. Box 731
Isle of Palms SC 29451
Office 843-884-2677
Fax 843-884-0677
Tax ID 57-1048595

Recap by Category

Items	Total	%
CONTENT MANIPULATION	52.94	1.14%
GENERAL DEMOLITION	305.59	6.57%
WATER EXTRACTION & REMEDIATION	4,293.04	92.25%
Subtotal	4,651.57	99.95%
Material Sales Tax @ 7.500%	2.13	0.05%
Total	4,653.70	100.00%



Main Level



Nationwide Insurance
 Allied Insurance
 Nationwide Agribusiness
 Title Insurance
 Vacation Insurance

Nationwide Mutual Insurance Company

Joe Miano
 One Nationwide Gateway Dept 5582
 Des Moines, IA 50391-5582
 Cell 843-412-3797 Fax 1-866-563-8956
 mianoj@nationwide.com

Insured: ALISON THORNLEY
 Property: 1515 CAMBRIDGE LAKES DR
 MT PLEASANT, SC 29464
 Home: 1209 BRIDGEPORT DR
 MT PLEASANT, SC 29466-7451

Home: (843) 270-3327
 Business: () -
 Other: (843) 270-3327

Claim Rep.: Joe Miano
 Business: ONE NATIONWIDE GATEWAY DEPT 5582
 DES MOINES, IA 50391-5582

Business: (843) 412-3797
 Fax: (866) 563-8956

Estimator: Joe Miano
 Business: ONE NATIONWIDE GATEWAY DEPT 5582
 DES MOINES, IA 50391-5582

Business: (843) 412-3797

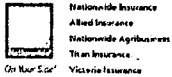
Claim Number: 6139901626UO10121701 **Policy Number:** 901626

Type of Loss: WATER DAMAGE NON WEATHER RELATED

Date Contacted: 12/17/2010
 Date of Loss: 12/17/2010
 Date Inspected: 12/17/2010
 Date Est. Completed: 1/10/2011 3:57 PM
 Date Received: 12/17/2010
 Date Entered: 12/21/2010 12:06 PM

Price List: SCCH7X_DEC10
 Restoration/Service/Remodel
 Estimate: ALISON_THORNLEY

EXHIBIT C



Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com

Dear Valued Customer,

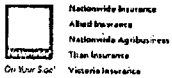
Please refer to the enclosed itemized estimate. This estimate contains our valuation of the damages for the reported loss and was prepared using reasonable and customary prices for your geographic area. If this document contains estimated structural repairs and you choose to hire a contractor, please provide this estimate to them.

If any hidden, or additional damage, and/or damaged items, are discovered, please contact me or have your contractor or vendor contact me immediately. Coverage for the hidden or additional damages and/or damaged items, would need to be determined, and may require an inspection/re-inspection, before any supplemental payment would be authorized. Please do not destroy, or discard any of the hidden, or additional damages, and/or damaged items, until we have had an opportunity to review the hidden or additional damages and/or damaged items, and have reached an agreement with you on any supplemental cost.

If you, your contractor, or vendor determine that there are additional building fees and/or permits associated with the estimated repairs, that may not be included in this estimate, please contact me immediately so that I may review and make a determination as to the appropriate payment.

If a mortgage company is included on your claim payment check, please contact the mortgage company to discuss how to handle the proceeds of this payment.

Thank you for allowing Nationwide Mutual Insurance Company to serve your insurance needs. Please contact me at the numbers listed above if you have any questions regarding this estimate or any other matter pertaining to your claim.



Nationwide Mutual Insurance Company

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 One Nationwide Gateway Dept 5582
 Des Moines, IA 50391-5582
 Cell 843-412-3797 Fax 1-866-563-8956
 mianoj@nationwide.com

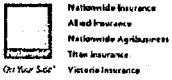
ALISON_THORNLEY

ALISON_THORNLEY

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
1. Floor Covering - Carpet (Bid Item)	1.00 EA	0.00	10,620.83	10,620.83
See attached approved itemized contractor estimate to repair water damage to the condo interior. Includes breakdown for labor, materials & tax. Vendor total is \$13,120.21 including O&P.				
Condo is 11 years old condition very good. Damaged interior trim portion being replaced is \$345.75 and is depreciated 11% or \$38.03.				
Interior paint was new in preparation for new tenant who recently moved in, so no paint depreciation. Only damaged portions repainted or textured.				
Carpet is age 1 1/2 years old condition very good quality above average. It is being replaced w/ the same carpet from the same original vendor to match existing. The carpet portion is \$3,551.60 with 10% depreciation of 355.16 taken based on quality, age and condition.				
Total: ALISON_THORNLEY				10,620.83

ALE

DESCRIPTION	QNTY	REMOVE	REPLACE	TOTAL
2. LOSS OF RENT	1.00 MO	0.00	1,150.00	1,150.00
Agreed allowance of 1 month lost rent being paid under loss of use coverage. Owners actually lost the entire month of rent during the mitigation and repairs.				
Totals: ALE				1,150.00
Line Item Totals: ALISON_THORNLEY				11,770.83



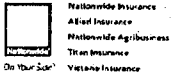
Nationwide Mutual Insurance Company

Joe Miano
 One Nationwide Gateway Dept 5582
 Des Moines, IA 50391-5582
 Cell 843-412-3797 Fax 1-866-563-8956
 mianoj@nationwide.com

Summary for Dwelling

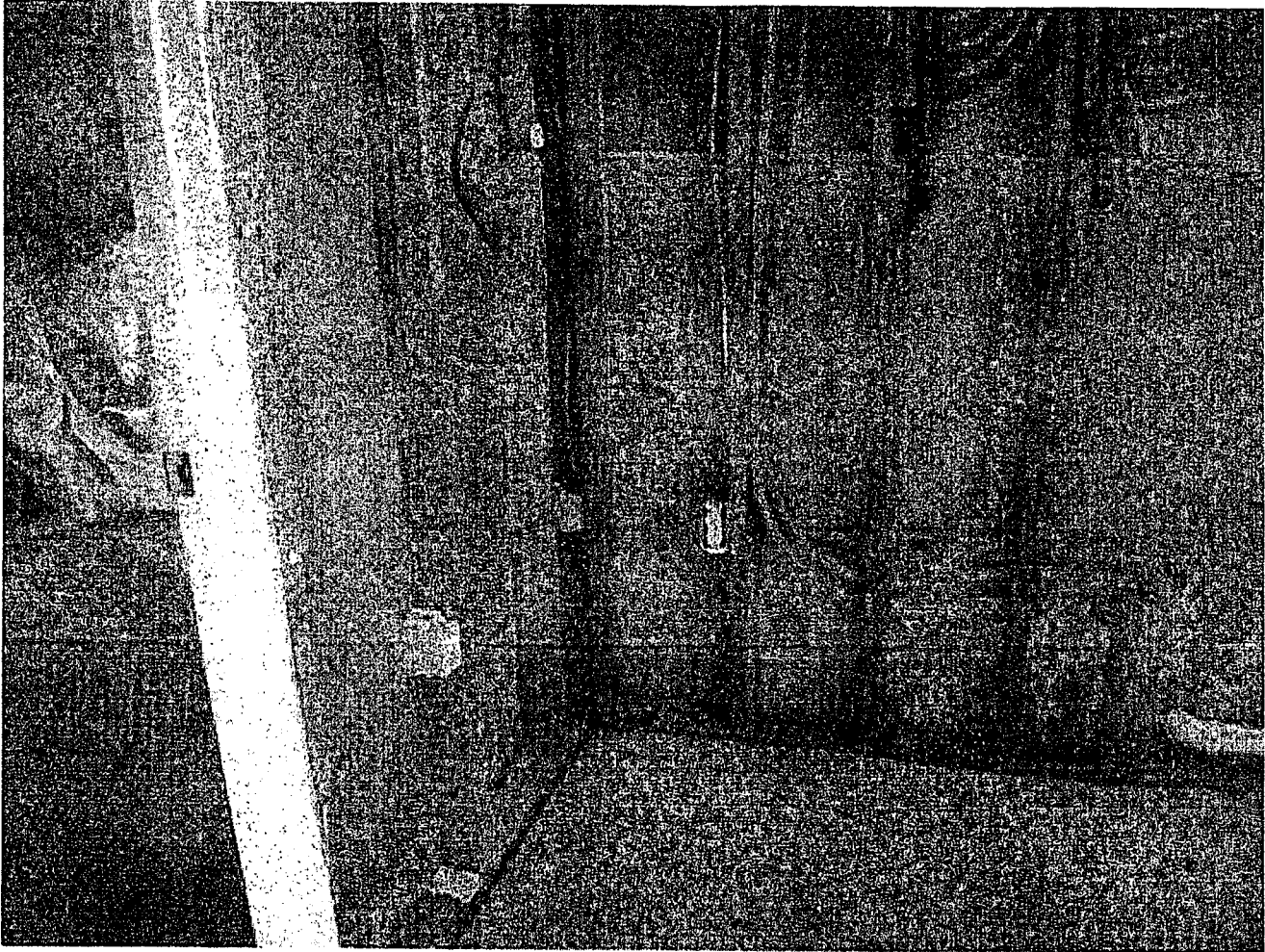
Line Item Total				11,770.83
Material Sales Tax	@	7.500% x	4,169.00	312.68
Subtotal				12,083.51
Overhead	@	10.0% x	10,933.51	1,093.35
Profit	@	10.0% x	10,933.51	1,093.35
Replacement Cost Value				\$14,270.21
Less Depreciation				(404.77)
Actual Cash Value				\$13,865.44
Less Deductible				(1,000.00)
Net Claim				\$12,865.44
Total Recoverable Depreciation				404.77
Net Claim if Depreciation is Recovered				\$13,270.21

 Joe Miano



Nationwide Mutual Insurance Company

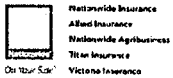
Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



1 THORNLEY-1

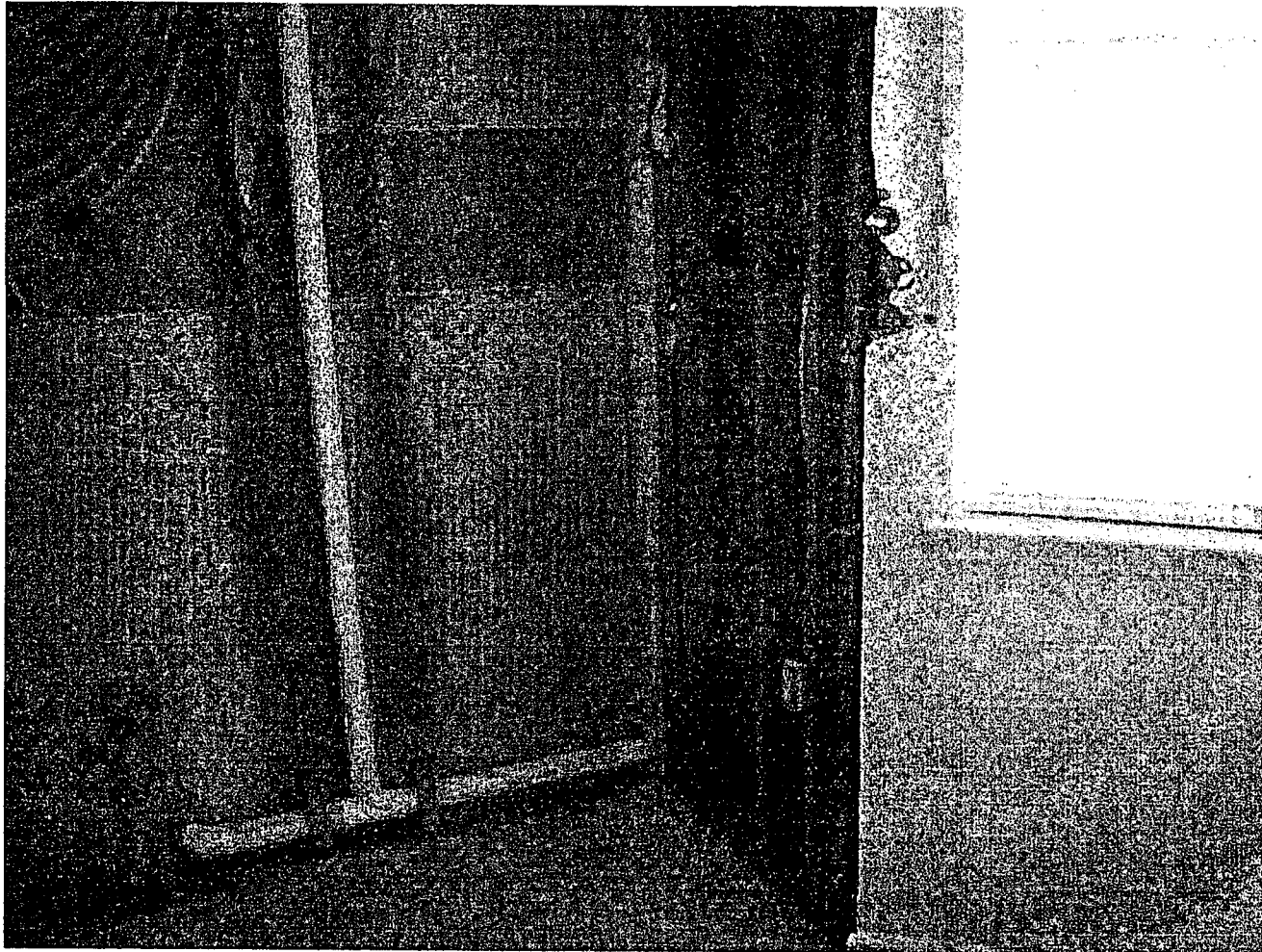
Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
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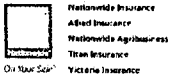


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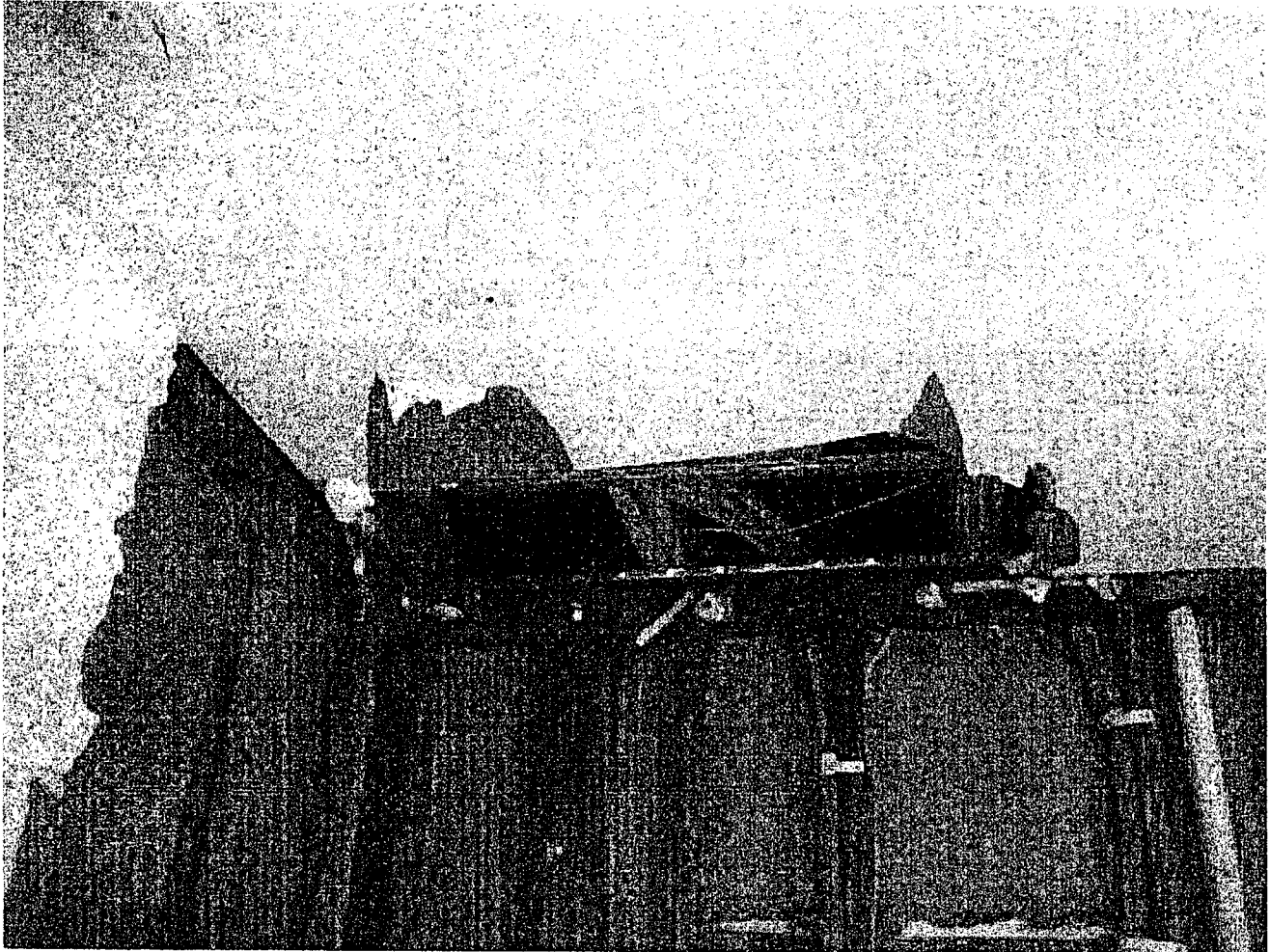
Date Taken: 12/17/2010

Taken By: Joe Miano



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One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
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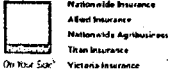


3

THORNLEY-3

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com

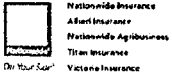


4

THORNLEY-4

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

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One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com

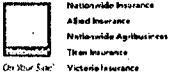


5

THORNLEY-5

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



6

THORNLEY-6

Date Taken: 12/17/2010

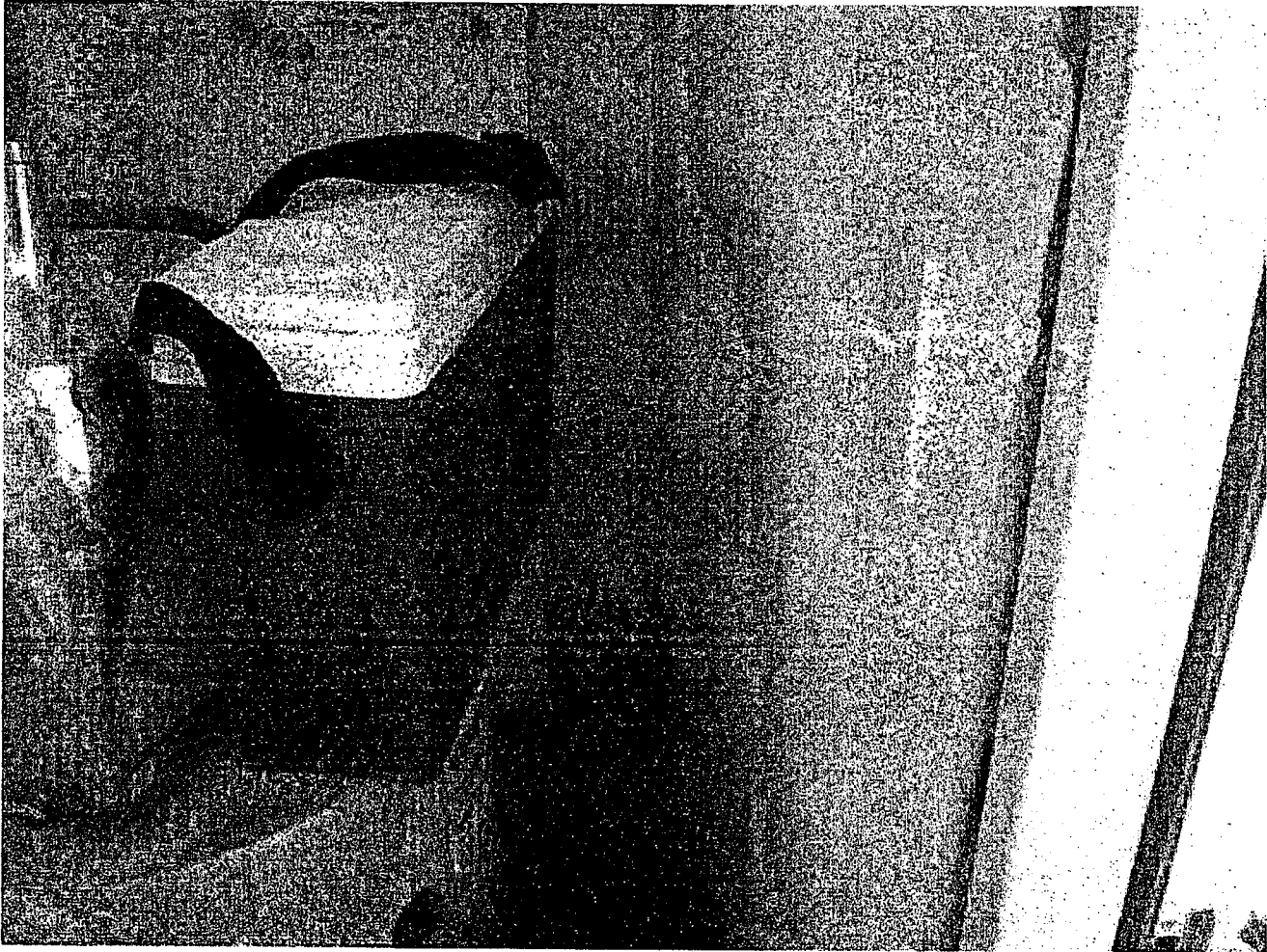
Taken By: Joe Miano



Nationwide Insurance
Auto Insurance
Nationwide Ag/Business
Travel Insurance
Vantage Insurance

Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com

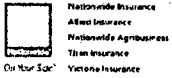


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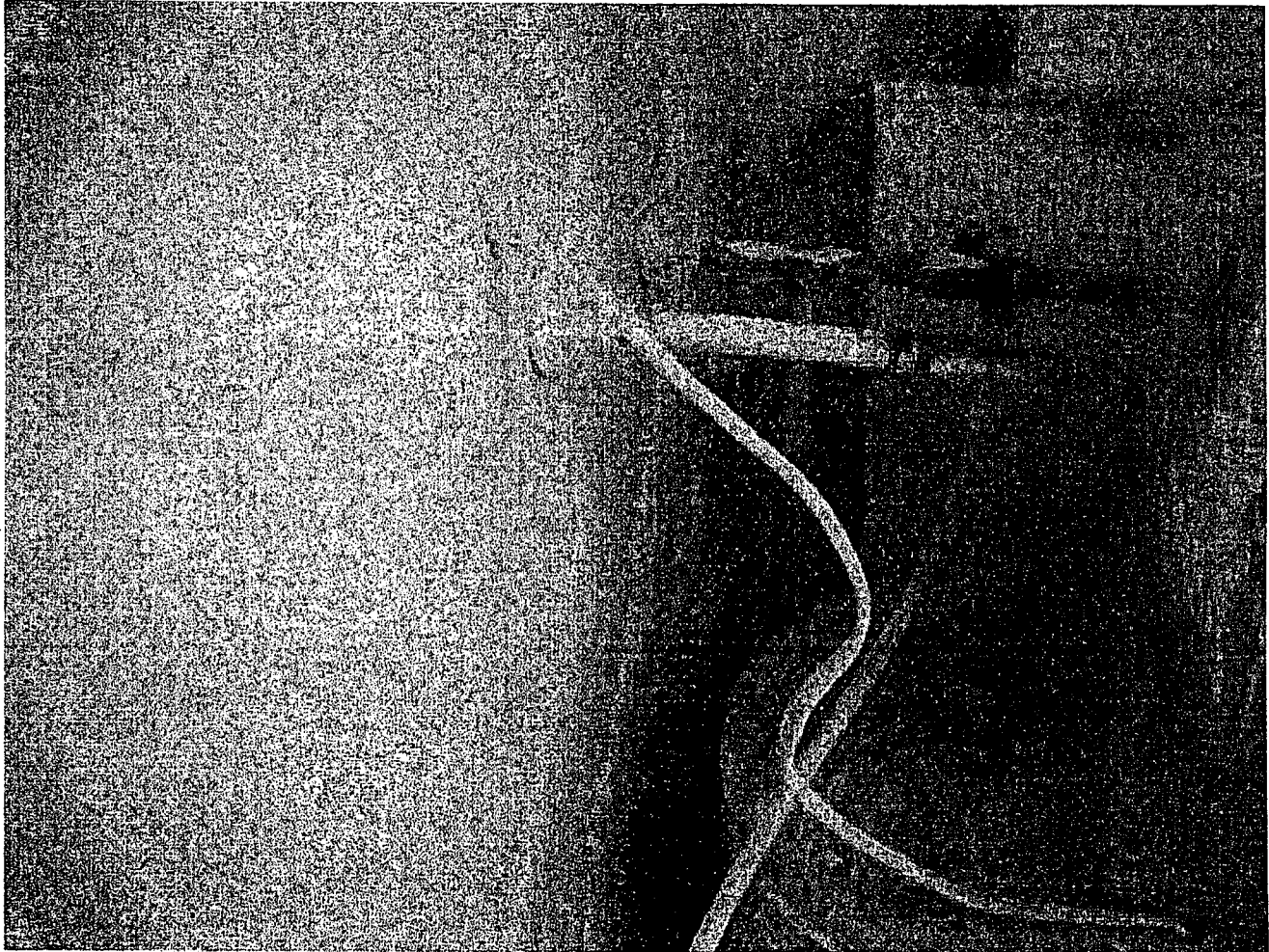
Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com

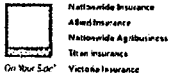


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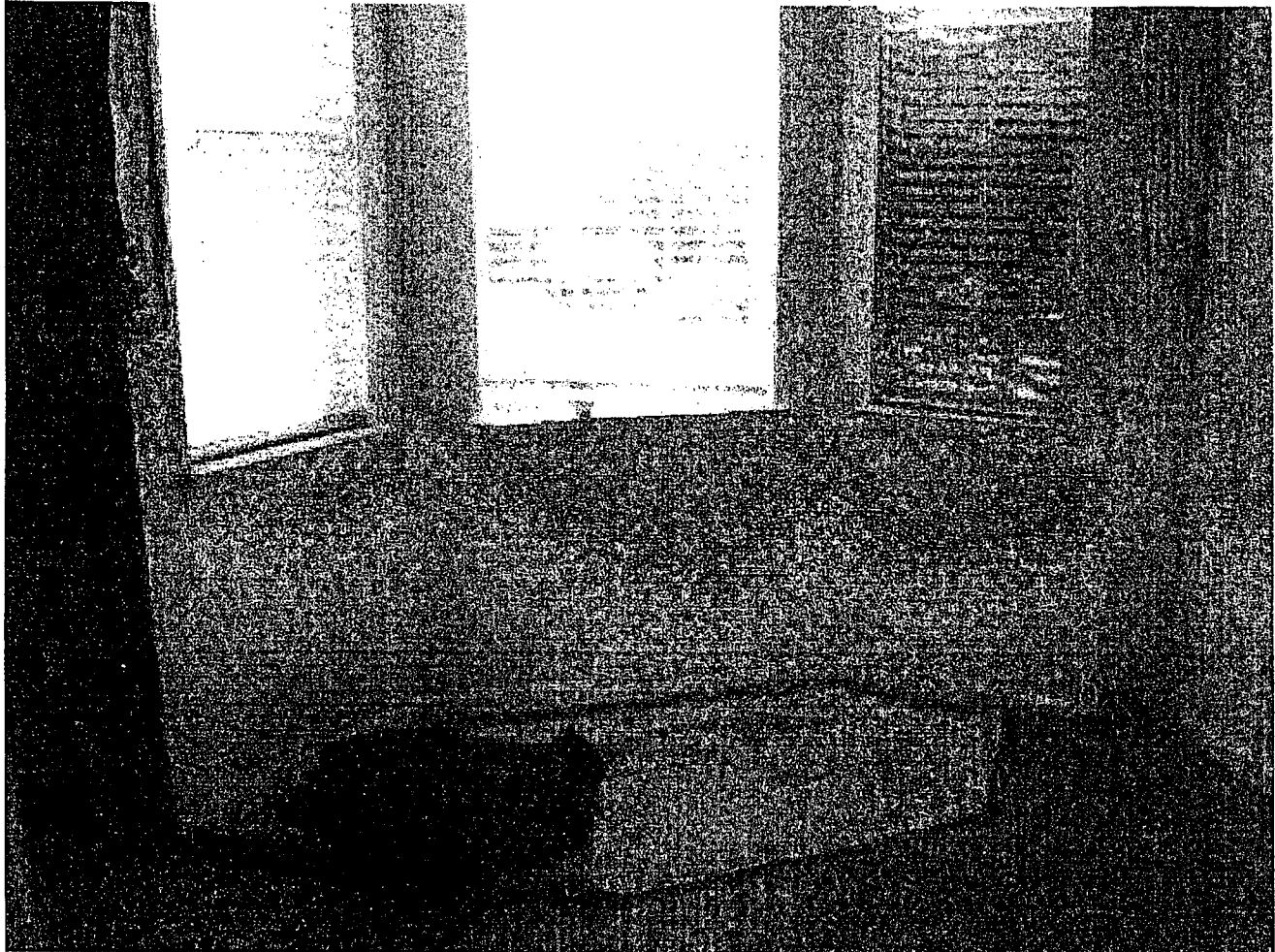
Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

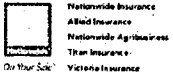
Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



9 THORNLEY-9

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



10 THORNLEY-10

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Insurance
Auto Insurance
Nationwide Agribusiness
Titan Insurance
Veterans Insurance

Nationwide Mutual Insurance Company

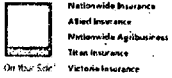
Joc Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



11 THORNLEY-11

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

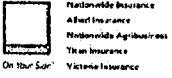
Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



12 THORNLEY-12

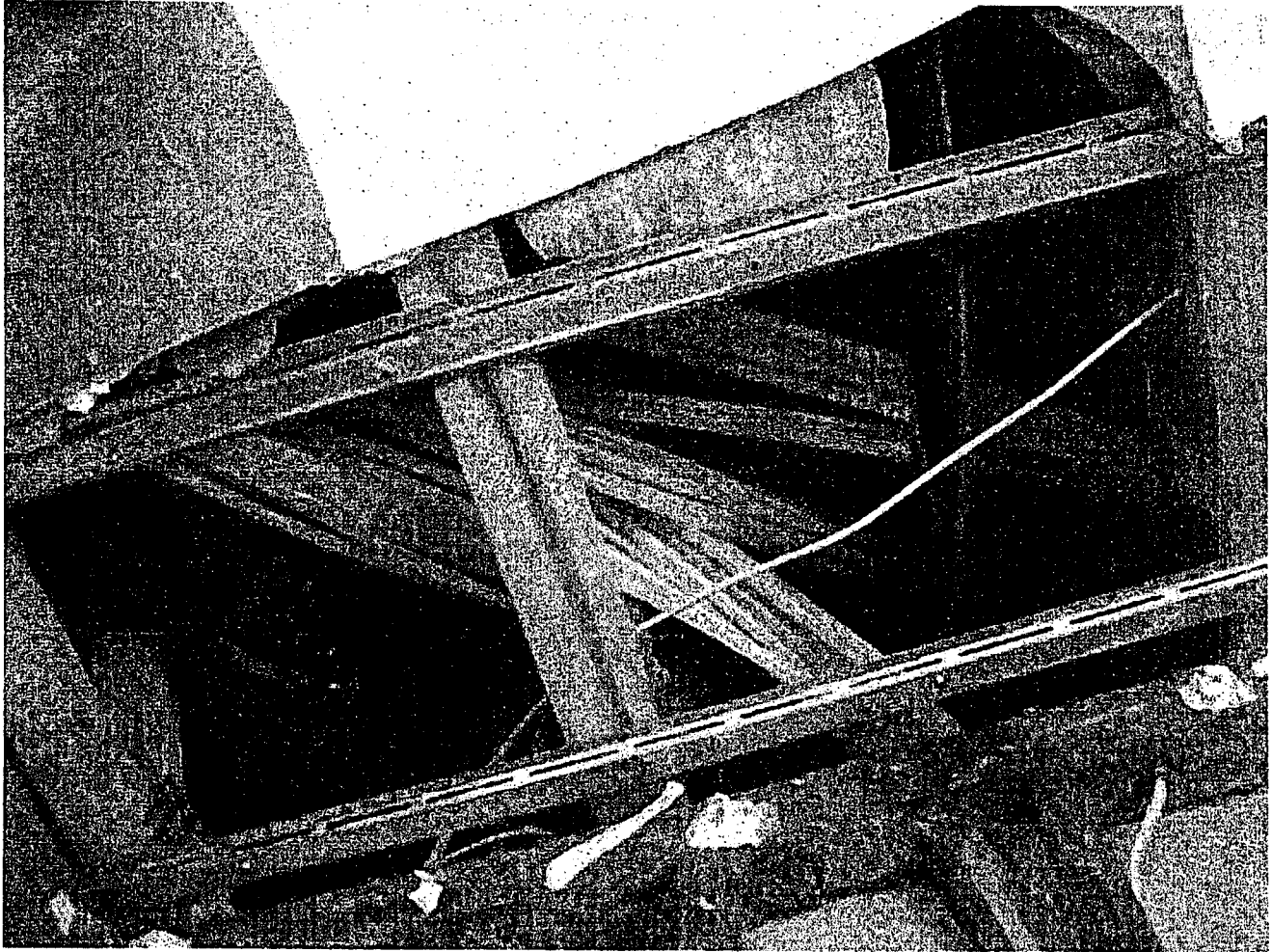
Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com

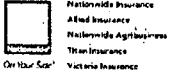


13

THORNLEY-13

Date Taken: 12/17/2010

Taken By: Joe Miano



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Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



14 THORNLEY-14

Date Taken: 12/17/2010

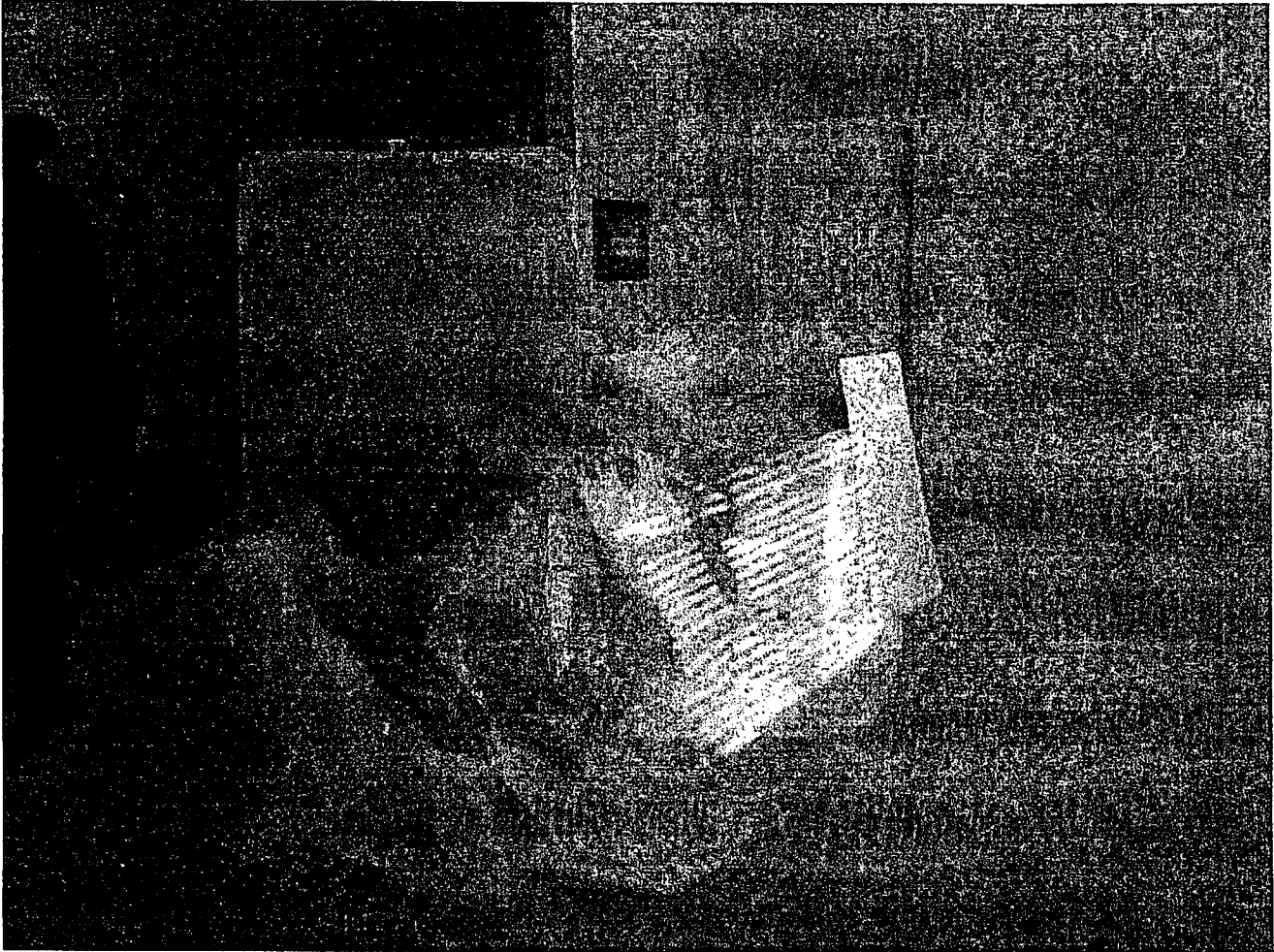
Taken By: Joe Miano



Nationwide Insurance
Auto Insurance
Nationwide Agribusiness
Titan Insurance
Victoria Insurance

Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



15 THORNLEY-15

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Insurance
Auto Insurance
Nationwide Ag/Business
Titan Insurance
Victory Insurance

Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
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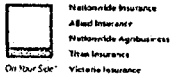


16

THORNLEY-16

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

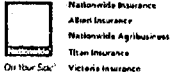
Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



17 THORNLEY-17

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com

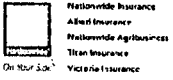


18

THORNLEY-18

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

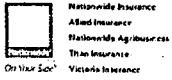
Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



19 THORNLEY-19

Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

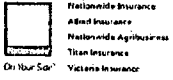
Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



20 THORNLEY-20

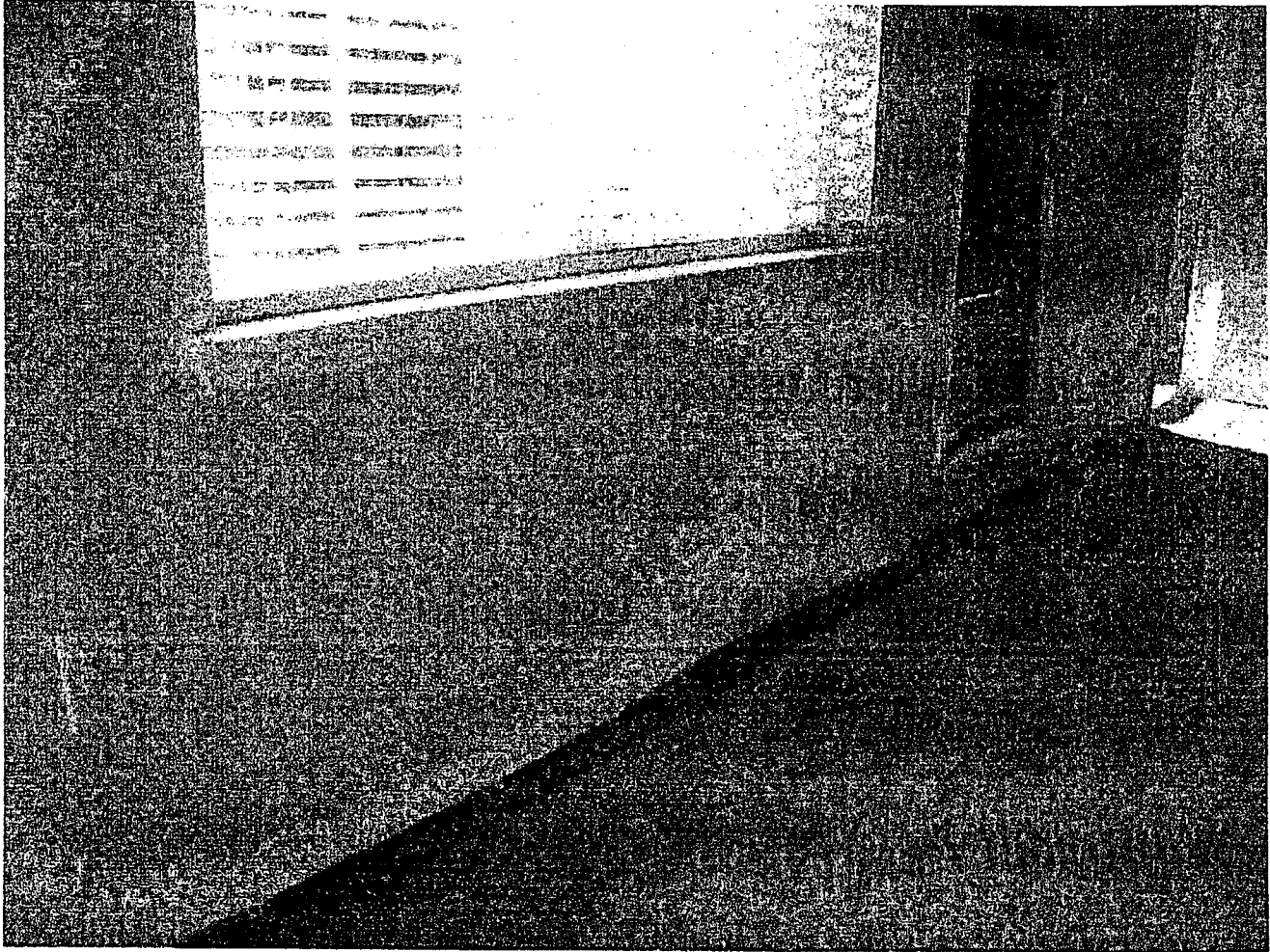
Date Taken: 12/17/2010

Taken By: Joe Miano



Nationwide Mutual Insurance Company

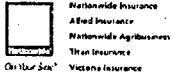
Joe Miano
One Nationwide Gateway Dept 5582
Des Moines, IA 50391-5582
Cell 843-412-3797 Fax 1-866-563-8956
mianoj@nationwide.com



21 THORNLEY-21

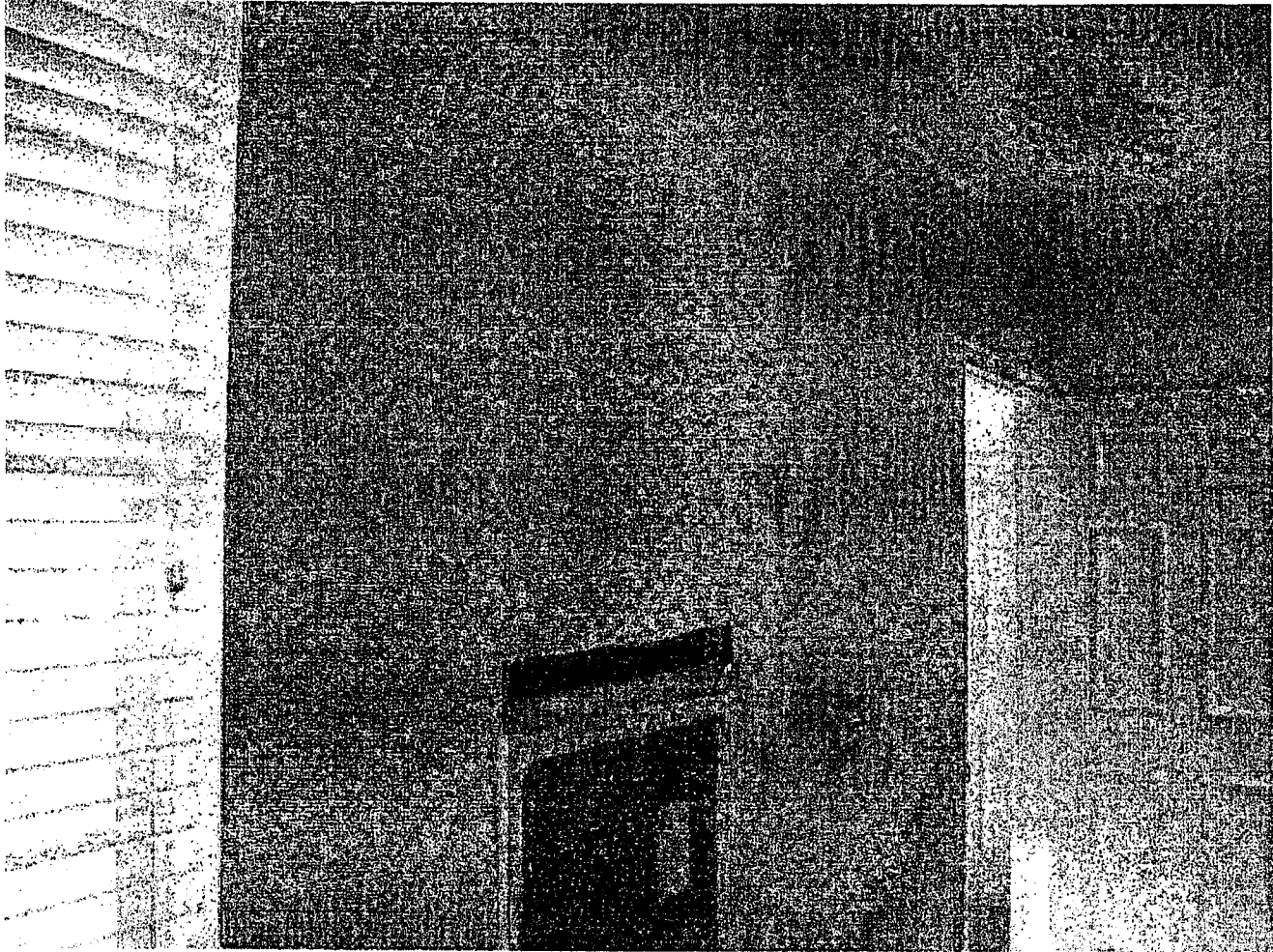
Date Taken: 12/17/2010

Taken By: Joe Miano



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Df m1954.523.48: 8!!!!Gby!2.977.674.9: 67
n jbokA objpox jef /dpm



33

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Eft !N pfof t-!JB !614: 2.6693
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34

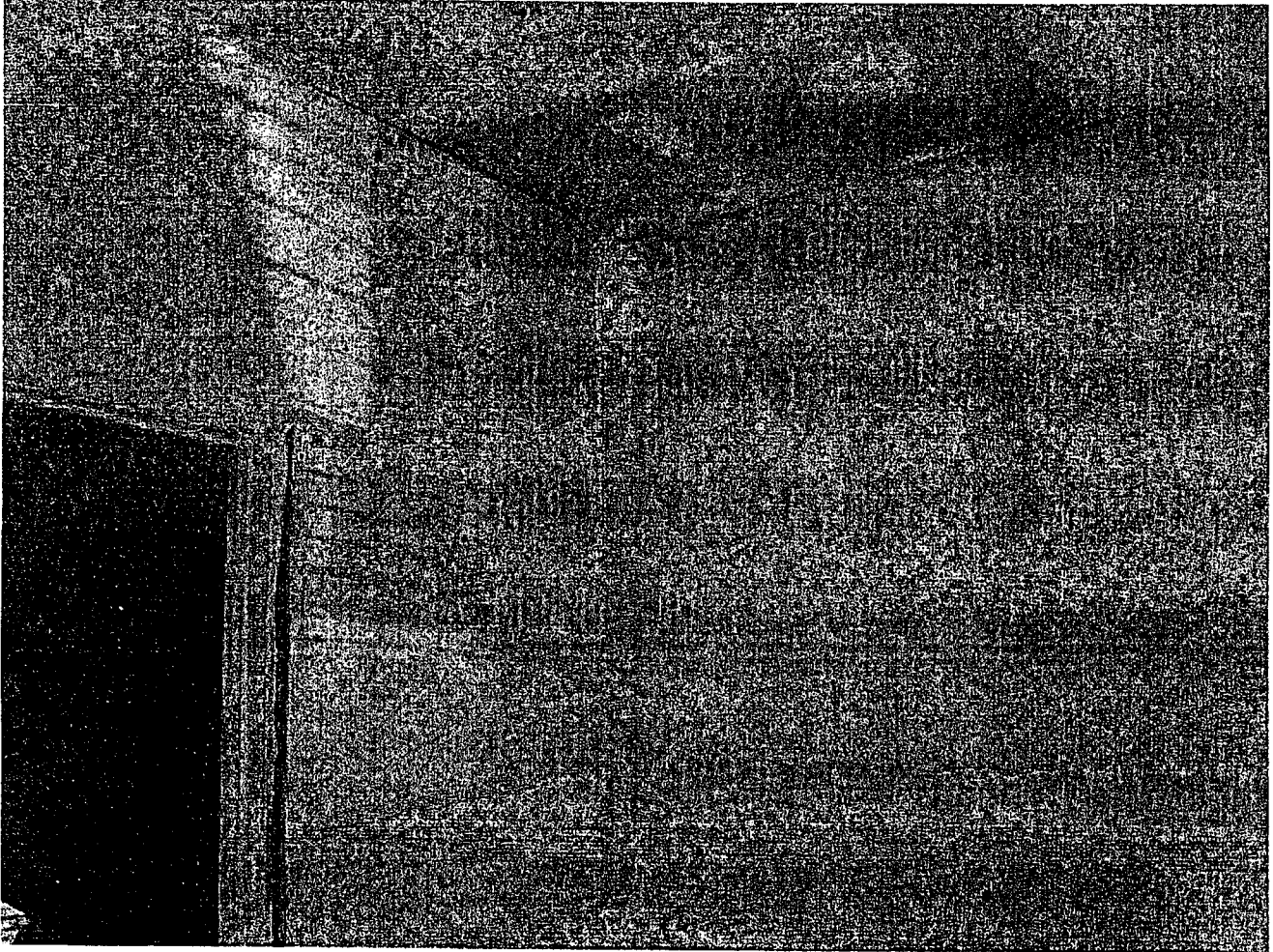
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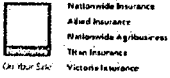


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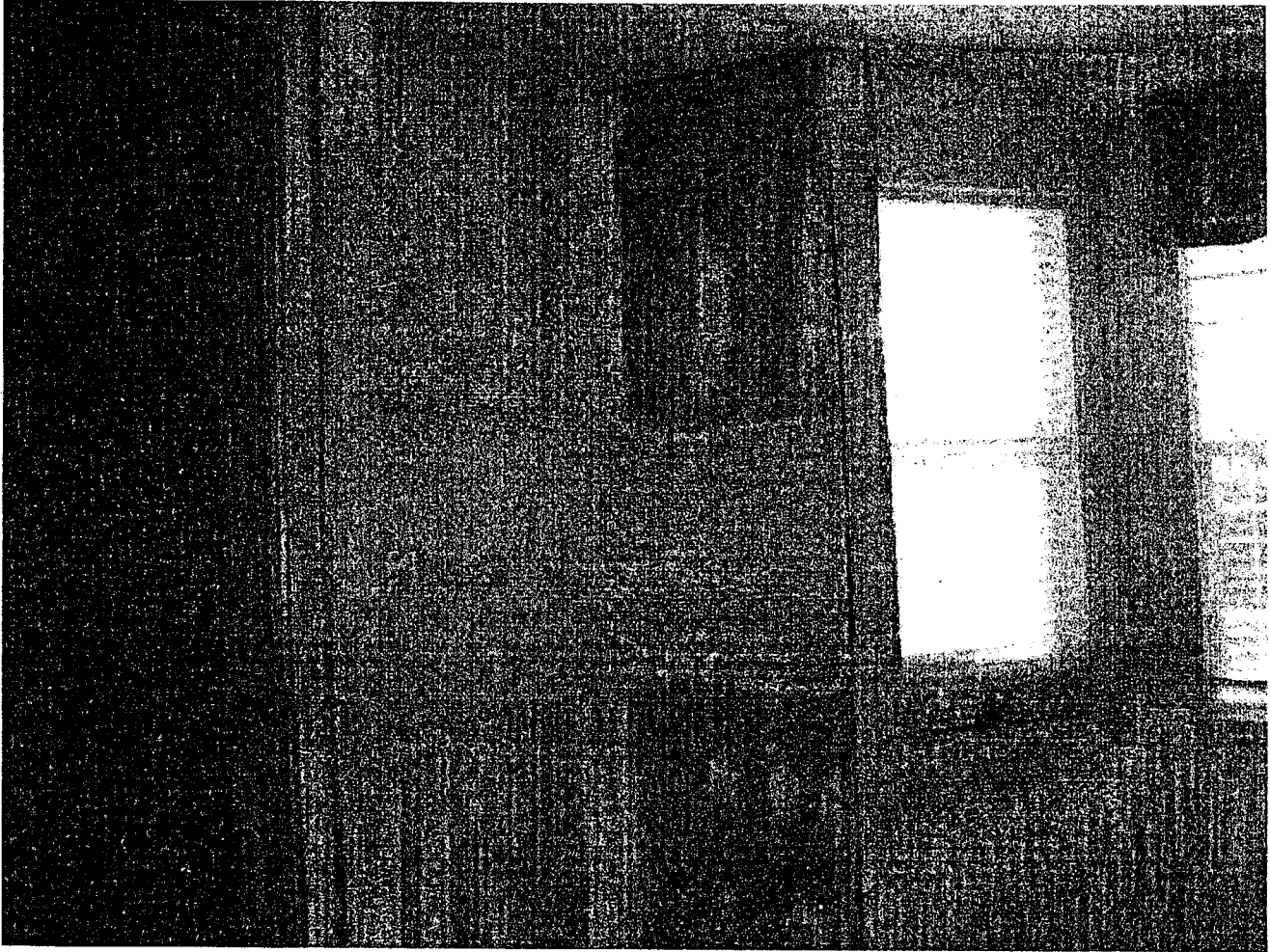
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Pof !Objpox jef !Hbux bz !Ef qu6693
Eft !N pjof t-!JB !614: 2.6693
Df mt954.523.48: 8!!!!Gby!2.977.674.9: 67
n jbojka objpox jef /dpm

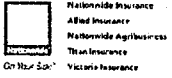


36

EVSJ.OH!SFGB.JST.3

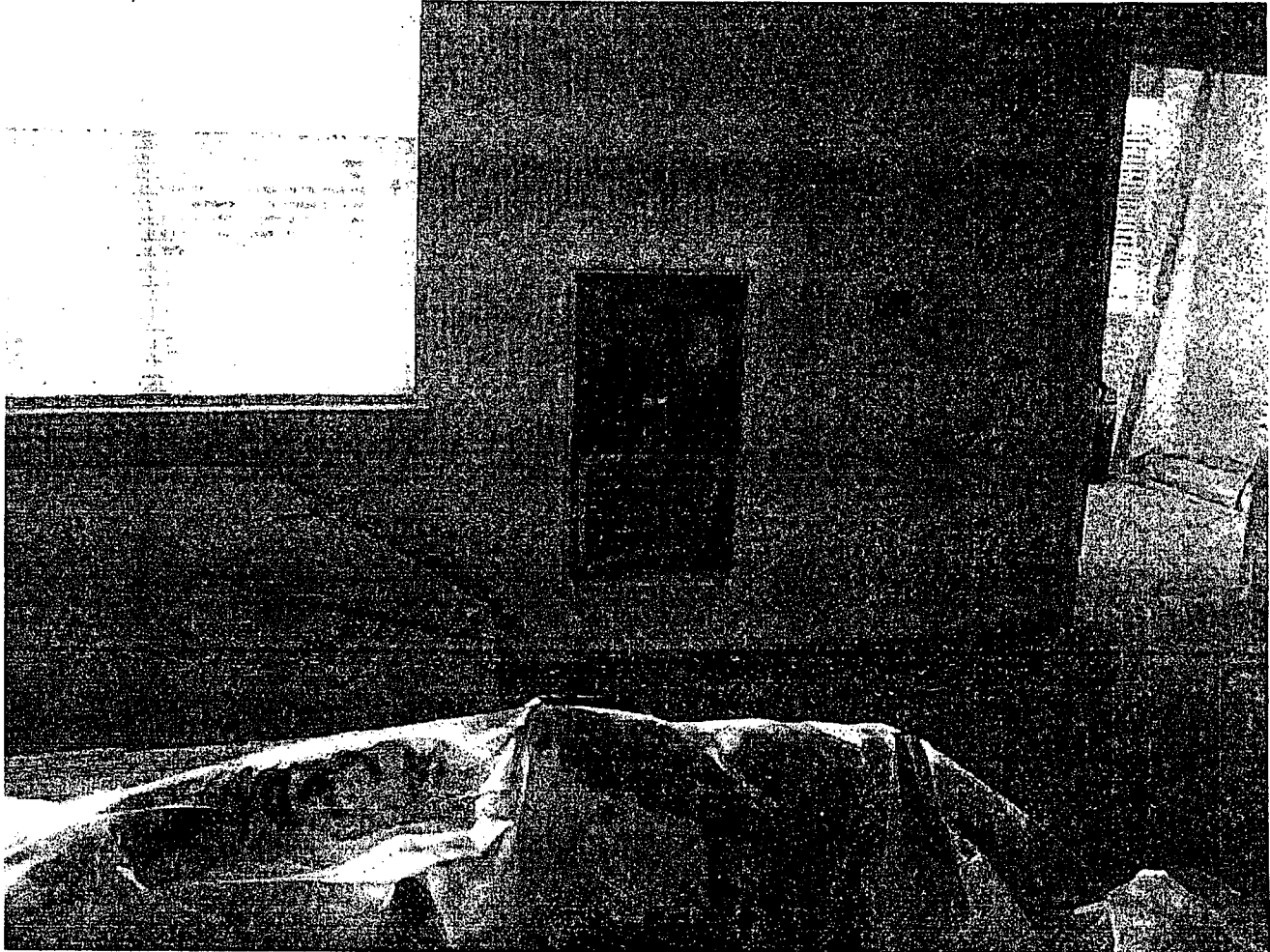
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Ubl fo!Cz;!Kpf !N jboj



Objpox jef !N vuvbrtlot vsbodf !Dpn qboz

Kpf !N j bop
Pof !Objpox jef !Hbxf x bz !E f qu6693
E f t !N pjof t -!J B !614: 2.6693
Df m 1954.523.48: 8!!!!Gby!2.977.674.9: 67
n j bopkA objpox jef /d pn



37

EV SJOH !S FGB .ST.4

Ebf !Ubl fo ;!2302808121

Ubl fo !Cz ;!Kpf !N j bop

Objpox jef !N vuvrtubt vsboof !Dpn qboz

Kpf !N jbof
P of !Objpox jef !Hbf x bz !E f qu 6693
E f t !N p j of t - !J B !6 14: 2.6693
Df m 1954.523.48: 8!!!!Gby !2.977.674.9: 67
n jbof kA objpox jef /d p n

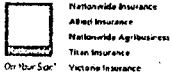


38

EVSJ0HISFCBJST.5

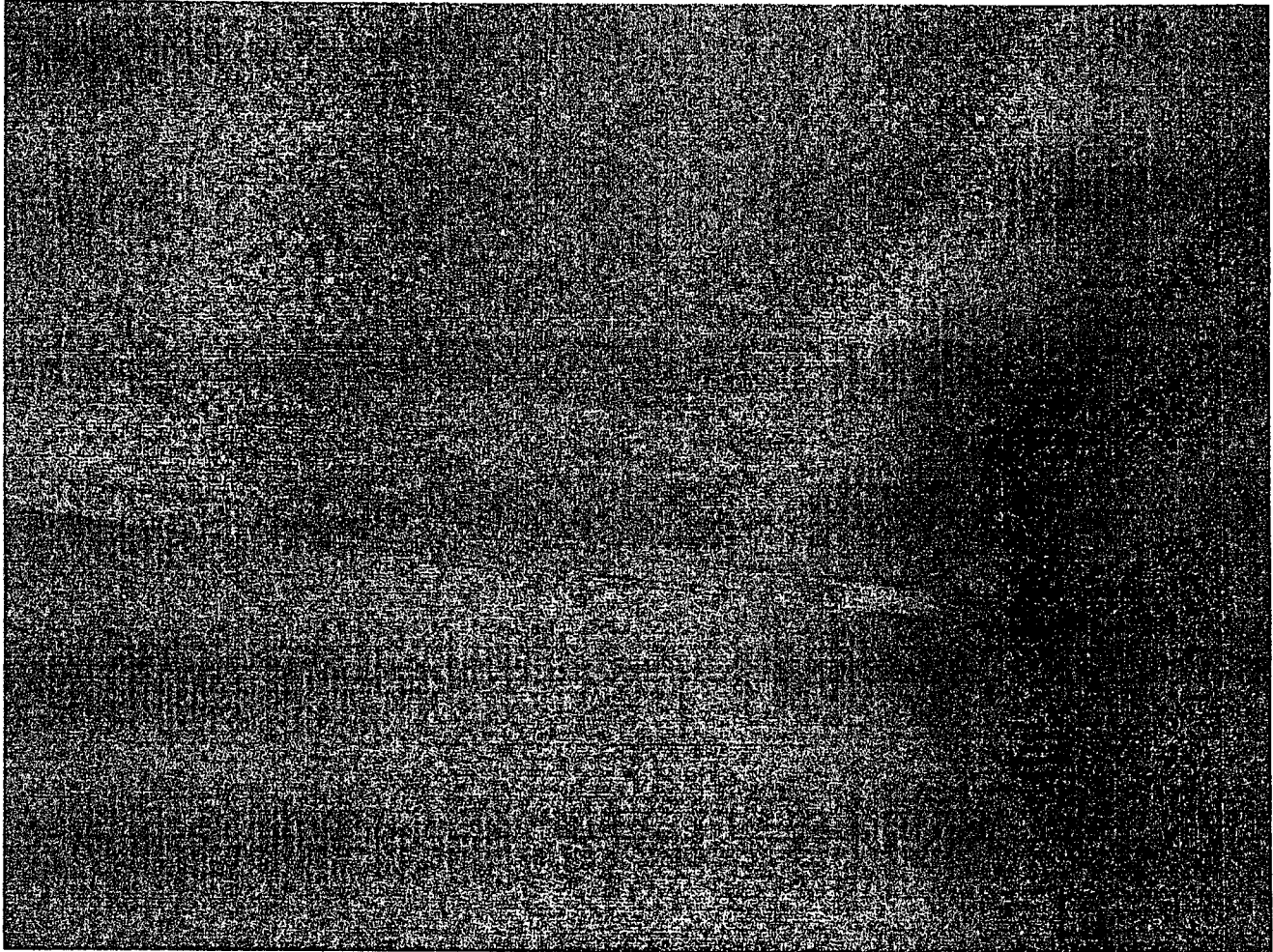
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Ubl fo !Cz: !Kpf !N jbof



Objpox jef !N vuvbrtlot vsbodf !Dpn qboz

Kpf !N j bop
Pof !Objpox jef !Hbfx bz!Ef qu6693
Eft !N pjof t-!JB !614: 2.6693
Df mt954.523.48: 8!!!!Gby!2.977.674.9: 67
n j bopkA objpox jef /dpn

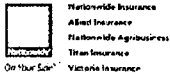


39

EVSJ0HISFCBJST.6

Ebf !Ubl fo;1230808121

Ubl fo!Cz;!Kpf !N j bop



Objpox jef !N vwbtrbtvsbof !Dpn qboz

Kpf !N jbo
Pof !Objpox jef !Hbfx bz !Ef qd6693
Eft !N pjof t-!JB !614: 2.6693
Df m!954.523.48: 8!!!!Gby!2.977.674.9: 67
n jboK objpox jef /dgn



3: EVSJOHISFCBJST.7

Ebf !Ud fo; !23080121

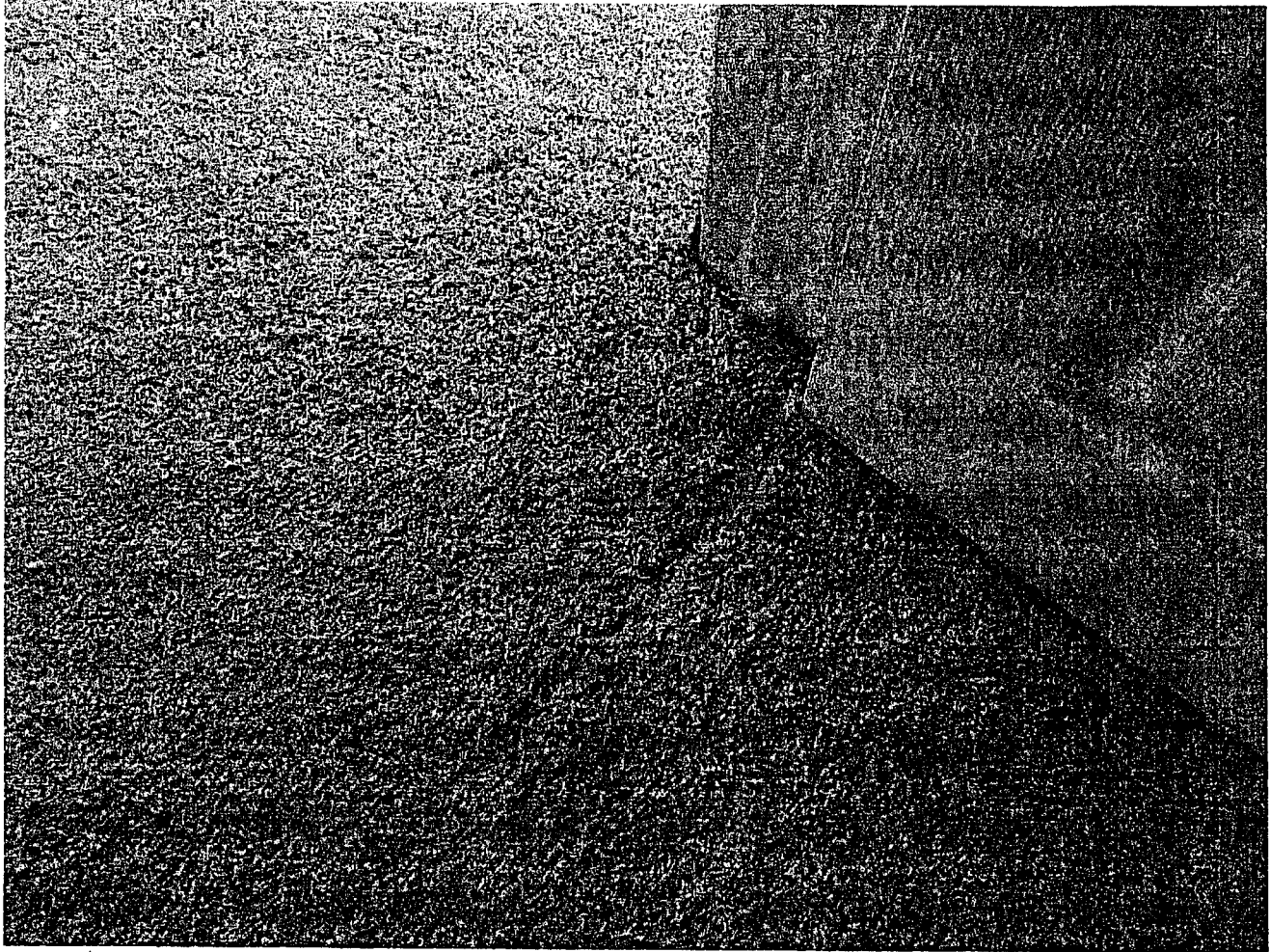
Ubl fo!Cz;!Kpf !N jbo



National Insurance
Auto Insurance
Marine Insurance
Travel Insurance
Vehicles Insurance

Objpox jef !N vuvbrtubt vsbodf !Dpn qboz

Kpf !N j bop
P of !Objpox jef !Hbux bz !E f qu6693
E f t !N p j of t - !J B !614: 2.6693
Df m 54.523.48: 8!!!!Gby!2.977.674.9: 67
n j bopA objpox jef /d pn



41

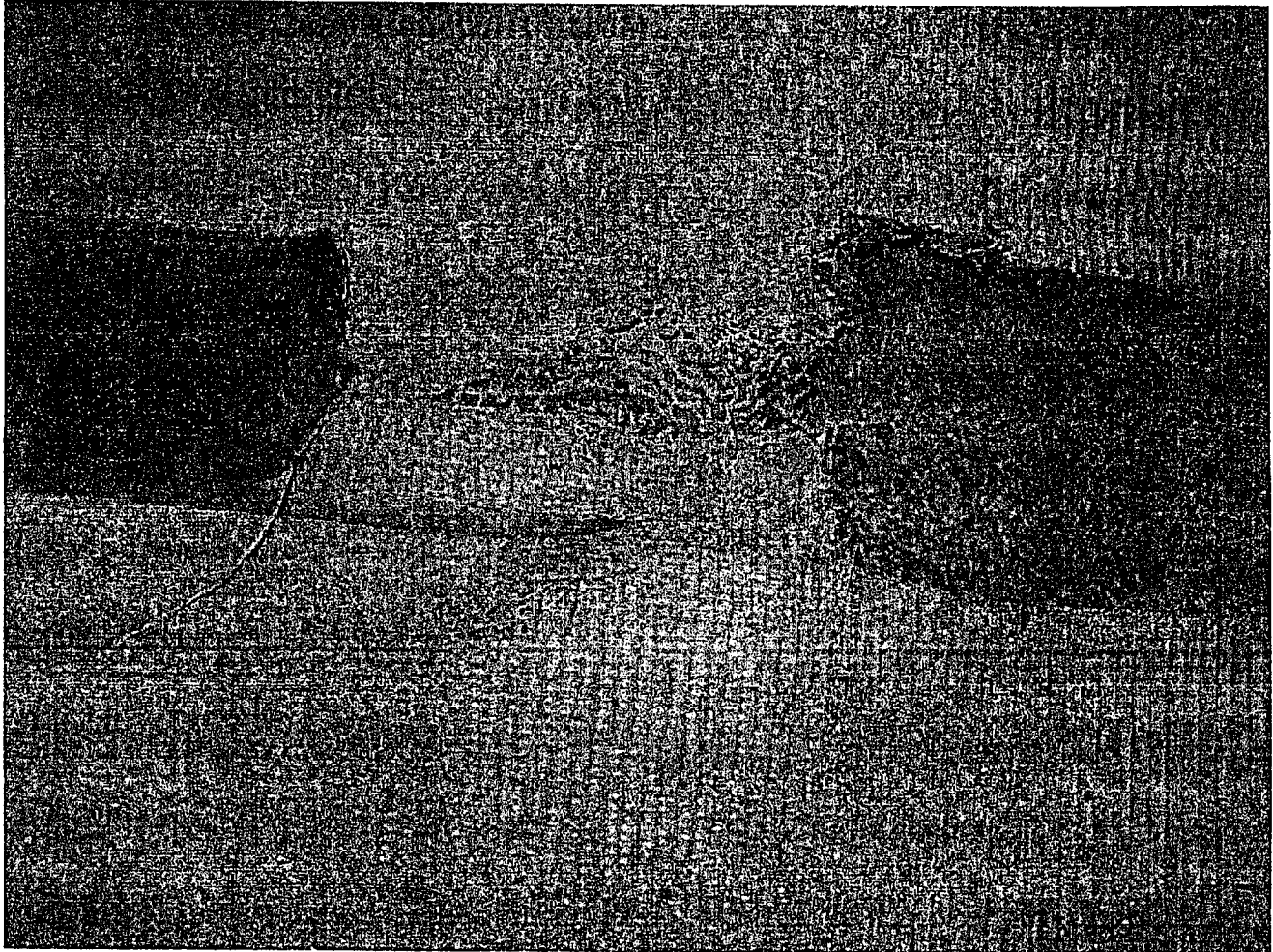
EV SJOH ISFCBJST.8

Ebf !Ud fo;!23080121

Ubl fo!Cz;!Kpf !N j bop

Objpox jef !N vuvrtlot vsbodf !Dpn qboz

Kpf !N jbo
Pof !Objpox jef !Hbfx bz!Efq6693
Eft !N pjof t-LB !614: 2.6693
Df m954.523.48: 8!!!!Gby!2.977.674.9: 67
n jboPkA objpox jef /dpm



42

EVSJOHISFCBJST.9

Ebf !Ubl fo;1230803121

Ubl fo!Cz;!Kpf !N jbo



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
DEPUTY CLERK

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COLUMBIA, SOUTH CAROLINA 29201
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September 11, 2014

Mr. Trace M. Dillon, Esquire
The Dillon Law Firm P.C.
1130 Hurricane Shoals Road Suite 600
Lawrenceville GA 30044

Re: Nationwide Property v. Gary McCombs
Appellate Case No. 2014-001907

Dear Counsel:

Upon reviewing your amended notice of appeal, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter:

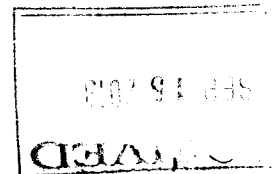
- The caption/title does not comply with Rule 267(a), SCACR. Specifically, the order you have provided features an abbreviated caption. Please provide a copy of an order issued in the same matter showing the complete caption. If there is no such order, please provide a copy of the original summons and complaint.

Very truly yours,

A handwritten signature in black ink that reads "Jenny Abbott Kitchings" with a stylized flourish at the end.

CLERK

cc: Andrew Steven Halio, Esquire
Robert Rhett Sansbury, III, Esquire



Trace Dillon, Esq.
Admitted to GA, SC & TN
Bars

THE DILLON LAW FIRM, PC
ATTORNEYS AT LAW

1130 Hurricane Shoals Rd
Suite 600
Lawrenceville, GA 30043

Toll Free (855) 591-0067
Facsimile (770) 513-6577
trace@dillonlawfirmpc.com
www.dillonlawfirmpc.com

September 16, 2014

VIA FIRST CLASS MAIL
CLERK OF COURT,
P.O. Box 11629
Columbia, SC 29201

RE: NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY
VS. GARY MCCOMBS
RAGAN MCCOMBS ALBERT
Our File No.: 13001448
Civil Action Number:2013CP1007203

Dear Clerk:

Pursuant to your request, please find a copy of the Summons and Complaint.

Should you have any questions, please feel free to call.

Sincerely yours,
THE DILLON LAW FIRM PC


TRACE DILLON

Enclosure

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SEP 25 2014

SC Court of Appeals



Court

11029

2, SC 29201

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