

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM ABBEVILLE COUNTY
Court of Common Pleas

Eugene C. Griffith, Jr., Circuit Court Judge

Case No. 2012-CP-01-00306
Appellate Case No. 2014-00946

Richard Wilson, Michael J. Antoniak, Jr., Marsha L. Antoniak, Anita L. Belton, Prescott Darren Bosler, Johnny Calhoun, Sallie Calhoun, Cynthia Gary, Robert Wayne Gary, Eugene P. Lawton, Jr., Jeanette Norman, James Robert Shirley, Robert W. Spires, Crystal Spires Wiley, Lewis S. Williams, Janie Wiltshire, Benjamin Franklin Wofford, Jr., and Rebecca Hammond Wofford,..... Respondents

v.

LAURA B. WILLIS and JESSE A. DANTICE, individually, and as agents and/or brokers for Southern Risk Insurance Services LLC, Travelers Casualty Insurance Co. of America, Allied Property and Casualty Insurance Co., Peerless Insurance Co., Montgomery Mutual Insurance Co., Safeco Insurance Co. of America, and Foremost Insurance Co., SOUTHERN RISK INSURANCE SERVICES, LLC, TRAVELERS CASUALTY INSURANCE CO. OF AMERICA, ALLIED PROPERTY AND CASUALTY INSURANCE CO., PEERLESS INSURANCE CO., MONTGOMERY MUTUAL INSURANCE CO., SAFECO INSURANCE CO. OF AMERICA, and FOREMOST INSURANCE CO.,..... Defendants,

Of whom Peerless Insurance Company, Montgomery Mutual Insurance Company, and Safeco Insurance Company of America are..... Appellants.

APPELLANTS' RESPONSE TO LAURIE WILLIAMS'
MOTION FOR CLARIFICATION

NELSON MULLINS RILEY & SCARBOROUGH, LLP

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Attorneys for Appellants

On September 17, 2014, Laurie Williams—a defendant in one of the underlying lawsuits giving rise to this appeal—filed a brief as a Respondent in this appeal. Subsequently, on October 9, 2014, Ms. Williams filed a Motion for Clarification of her status in this appeal, setting out reasoning why she should be considered a Respondent. Appellants hereby consent to the Motion for Clarification and do not object to Ms. Williams being included as a Respondent in this appeal. Appellants will file their Reply to Ms. Williams' Brief upon notice from the Court of Appeals that they may do so.

NELSON MULLINS RILEY & SCARBOROUGH LLP

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Attorneys for Appellants Peerless Insurance Company,
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Insurance Company of America.

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Columbia, South Carolina

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Respondent,

v.

LAURA B. WILLIS and JESSE A. DANTICE, individually, and as agents and/or brokers for Southern Risk Insurance Services LLC, Travelers Casualty Insurance Company of America, Allied Property and Casualty Insurance Company, Peerless Insurance Company, Montgomery Mutual Insurance Company, Safeco Insurance Company of America, and Foremost Insurance Company, SOUTHERN RISK INSURANCE SERVICES, LLC, TRAVELERS CASUALTY INSURANCE COMPANY OF AMERICA, ALLIED PROPERTY AND CASUALTY INSURANCE COMPANY, PEERLESS INSURANCE COMPANY, MONTGOMERY MUTUAL INSURANCE COMPANY, SAFECO INSURANCE COMPANY OF AMERICA, AND FOREMOST INSURANCE COMPANY,

Defendants,

Of Whom Peerless Insurance Company, Montgomery Mutual Insurance Company, and Safeco Insurance Company of America are.....

Appellants.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Montgomery Mutual Insurance Company, Peerless Insurance Company, and Safeco Insurance Company of America, do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Pleadings:

Appellants' Response to Laurie Williams' Motion for Clarification

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October 20, 2014

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The Honorable Jenny Abbott Kitchings
Clerk of Court, SC Court of Appeals
1015 Sumter Street - 5th Floor
Columbia, SC 29201

RE: Richard W. Wilson v. Laura B. Willis, and Jesse A. Dantice, et al.
Civil Action No. 2012-CP-01-306
Appellate Case No. 2014-000946
Our File No. 00350/01679

Dear Ms. Kitchings:

Enclosed please find the original and seven copies of Appellants' Response to Laurie Williams' Motion for Clarification in regard to the above-referenced matter. We would ask that you file the original and return a clocked-in copy to us via our courier.

By copy of this letter to counsel of record, we are serving them with a copy of this pleading.

Very truly yours,


Miles E. Coleman

MEC:lpw

Enclosure

cc: Thomas E. Hite, Jr., Esquire
William H. Nicholson III, Esquire
Mason A. Goldsmith, Esquire
Elizabeth M. McMillan, Esquire
Jeffrey C. Kull, Esquire
D. Larry Kristinik, Esquire
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