

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

D. Craig Brown, Circuit Court Judge

Circuit Case No. 2012-CP-07-1352
Appellate Case No. 2013-002578

Bruce R. Hoffman,

Appellant,

v.

Seneca Specialty Insurance Company; CRC Insurance
Company; CRC Insurance Services, Inc. d/b/a Southern Cross
Underwriters of Sumter; Adylette Services of Lowcountry, Inc.,
and Capstone ISG, Inc.,

Defendants,

Of whom Seneca Specialty Insurance Company is the Respondent.

**RESPONDENT'S MOTION FOR LEAVE TO FILE
SUPPLEMENTAL RECORD ON APPEAL**

YOUNG CLEMENT RIVERS, LLP
Stephen L. Brown (SC Bar No. 66468)
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Joshua P. Cantwell (SC Bar No. 76368)
Russell G. Hines (SC Bar No. 72100)
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Attorneys for Respondent

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SC Court of Appeals

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TO: THE HONORABLE JUDGES OF THE SOUTH CAROLINA
COURT OF APPEALS

COMES NOW Respondent, Seneca Specialty Insurance Company, by and through its undersigned counsel, and hereby respectfully requests that this Honorable Court grant it leave to file/serve the attached Supplemental Record on Appeal and to cite thereto in its Final Brief of Respondent, which is provisionally filed contemporaneously herewith.

The attached Supplemental Record on Appeal includes only the following substantive matter: Causes of Loss – Special Form, as attached to Hoffman’s Motion for Summary Adjudication of Issue (Rule 56)/Injunctive Relief filed May 4, 2012, which was designated for inclusion in the Record on Appeal by Respondent. (*See* Respondent’s Designation of Matter to be Included in the Record on Appeal (specifically ¶11), (with Proof of Service) dated August 11, 2014 and file-stamped August 13, 2014, which is attached hereto as **Exhibit A** and incorporated herein by reference.) Although the Record on Appeal prepared by Appellant included most of the matter that Respondent designated for inclusion, it did not include this item in its entirety.

Respondent submits that there is good cause to grant the present motion, such motion being consistent with the interests of justice and not unduly prejudicial to any party.

WHEREFORE, Respondent respectfully requests that the proposed Supplemental Record on Appeal (the original, along with the requisite number of copies under Rule 210(b), SCACR, being filed herewith, and a copy now served on Appellant), be allowed and accepted as filed along with the Final Brief of Respondent, which cites thereto, and which is provisionally filed contemporaneously herewith.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Stephen L. Brown (SC Bar No. 66468)

Edward D. Buckley Jr. (SC Bar No. 994)

Joshua P. Cantwell (SC Bar No. 76368)

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Attorneys for the Respondent

Charleston, South Carolina

Dated: 12/3/14

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Defendants,

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PROOF OF SERVICE

YOUNG CLEMENT RIVERS, LLP
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Attorneys for the Respondent **RECEIVED**

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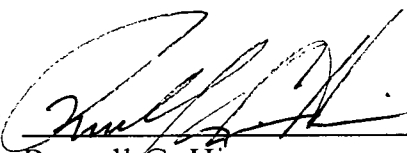
SC Court of Appeals

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondent above named, do hereby certify that I have served **Respondent's Motion for Leave to File Supplemental Record on Appeal** and **Supplemental Record on Appeal** on all other parties to this appeal by depositing a copy of the same in the United States Mail, postage prepaid, on December 3, 2014, addressed as follows to said parties or their counsel of record:

Bruce R. Hoffman, Esquire
Law Office of Bruce R. Hoffman, LLC
574 Sea Island Parkway
Saint Helena Island, SC 29920
Appellant/Attorney for Appellant

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines

Charleston, South Carolina

Dated: 12/3/14

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