

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

RECEIVED

AUG 13 2014

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

SC Court of Appeals

D. Craig Brown, Circuit Court Judge

RECEIVED

DEC 10 2014

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

SC Court of Appeals

Bruce R. Hoffman,

Appellant,

v.

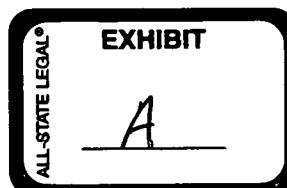
Seneca Specialty Insurance Company; CRC Insurance  
Company; CRC Insurance Services, Inc. d/b/a Southern Cross  
Underwriters of Sumter; Adylette Services of Lowcountry, Inc.,  
and Capstone ISG, Inc.,

Defendants,

Of whom Seneca Specialty Insurance Company is the Respondent.

RESPONDENT'S DESIGNATION OF MATTER

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Edward D. Buckley Jr. (SC Bar No. 994)  
Joshua P. Cantwell (SC Bar No. 76368)  
Russell G. Hines (SC Bar No. 72100)  
Post Office Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for Respondent*



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

Respondent proposes the following to be included in the Record on  
Appeal:

1. Order of the Circuit Court (Judge Dukes) filed May 30, 2012
2. Order of the Circuit Court (Judge Dukes) filed January 7, 2013
3. Order of the Circuit Court (Judge Mullen) filed April 8, 2013
4. Order of the Circuit Court (Judge Mullen) filed April 24, 2013
5. Order of the Circuit Court (Judge Brown) filed November 12, 2013, granting Seneca summary judgment
6. Order of the Circuit Court (Judge Brown) filed November 12, 2013, denying Hoffman summary judgment
7. Order of the Circuit Court (Judge Brown) filed October 31, 2013, granting summary judgment in favor of Aydlette
8. Order dismissing Hoffman's appeal of CRC's summary judgment filed December 20, 2013
9. Summons and Complaint filed April 3, 2012
10. Seneca's Answer filed May 15, 2012
11. Hoffman's Notice of Motion and Motion for Summary Adjudication of Issue (Rule 56)/Injunctive Relief filed May 4, 2012 (with Attachments)
12. Hoffman's Motion for Reconsideration (of May 30, 2012, Order) filed June 28, 2012
13. Hoffman's Motion for Pre-Trial Hearing/Status Conference (Rule 16) and for Summary Judgment (Rule 56) filed May 6,

2013

14. Seneca/Capstone's Motion for Summary Judgment filed May 6, 2013
15. Seneca/Capstone's Memorandum of Law in Support of Motion for Summary Judgment dated May 6, 2013 (with all Exhibits, including color photographs attached to Dodd affidavit)
16. Hoffman's Notice of Appeal of CRC's summary judgment dated May 6, 2013
17. Hoffman's Notice of Appeal of Orders Granting Seneca Summary Judgment and Denying Hoffman Summary Judgment dated November 27, 2013
18. Remittitur of Hoffman's appeal of CRC's summary judgment filed January 14, 2014
19. Transcript of Record from October 2, 2013 (before Judge Brown)
20. Transcript of Record from June 24, 2013 (before Judge Mullen)
21. Letter from Judge Mullen dated August 14, 2013, regarding recusal

I certify that this Designation of Matters contains no matter which is irrelevant to this appeal.

**SIGNATURE ON NEXT PAGE**

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)

Russell G. Hines (SC Bar No. 72100)

Post Office Box 993

Charleston, South Carolina 29402

(843) 720-5488

*Attorneys for the Respondent*

Charleston, South Carolina

Dated: 8/11/14

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.

---

**PROOF OF SERVICE**

---

YOUNG CLEMENT RIVERS, LLP  
Stephen L. Brown (SC Bar No. 66468)  
Edward D. Buckley Jr. (SC Bar No. 994)  
Joshua P. Cantwell (SC Bar No. 76368)  
Russell G. Hines (SC Bar No. 72100)  
Post Office Box 993  
Charleston, South Carolina 29402  
(843) 720-5488  
*Attorneys for the Respondent*

**RECEIVED**

AUG 13 2014

SC Court of Appeals

**RECEIVED**

DEC 10 2014

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 the **INITIAL BRIEF OF RESPONDENT** and **RESPONDENT'S DESIGNATION OF MATTER** on all other parties to this appeal by depositing a copy of the same in the United States Mail, postage prepaid, on August 11, 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,

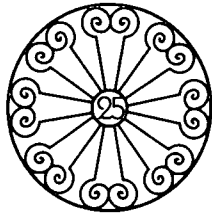
YOUNG CLEMENT RIVERS, LLP

By: 

Russell G. Hines

Charleston, South Carolina

Dated: 8/11/14



**YCR LAW**  
Young Clement Rivers, LLP

Russell G. Hines

Direct Dial: (843) 720-5488  
Direct Fax: (843) 579-1327  
E-mail: RHines@ycrlaw.com

December 8, 2014

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Bruce R. Hoffman v. Seneca Specialty Insurance Company; CRC Insurance Services, Inc. d/b/a Southern Cross Underwriters of Sumter; Aydlette Services of Lowcountry, Inc.; and Capstone ISG, Inc.  
Appellate Case No.: 2013-002578  
Case No.: 2012-CP-07-01352  
Claim No.: 12BBN034  
Date of Loss: 2/3/2012  
YCR File: 7811-20120293

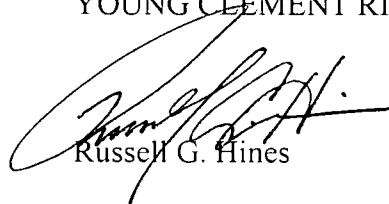
Dear Ms. Kitchings:

It has come to my attention that Exhibit A to Respondent's Motion for Leave to File Supplemental Record on Appeal was inadvertently left out of the recent filing. As such, I am enclosing the original and seven (7) copies of Exhibit A and ask that you allow it to be attached to the motion referenced above.

Please let me know if a more formal request is needed. Otherwise, kindly file the original and return one court-stamped copy to me using the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



Russell G. Hines

RGH/amj  
Enclosures  
cc: Bruce R. Hoffman, Esquire

**RECEIVED**

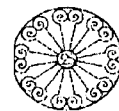
DEC 10 2014

**SC Court of Appeals**



ZIP 29401  
011D12603180

# FIRST CLASS MAIL



**YCRLAW**

25 Calhoun Street, Suite 400  
P.O. Box 993  
Charleston, SC 29402-0993

KBB  
7811-  
20120293

Jenny Abbott Kitchings, Clerk of  
Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

DEC 10 2014

**SC Court of Appeals**

