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March 6, 2015

RECEIVED

MAR 10 2015

S.C. Supreme Court

Daniel E. Shearouse, Clerk of Court
Supreme Court of South Carolina
PO Box 11330
Columbia, SC 29211

Re: *George Skipper, Veronica Skipper, Michael Perry Bowers, Specialty Logging, LLC, and Harold Moors v. ACE Property and Casualty Insurance Company, Brantley C. Rowlen, and Erin Lawson Coia*
Appellate Case No. 2014-001979

Dear Mr. Shearouse:

Enclosed please find an original and seven (7) copies of ACE Property and Casualty Insurance Company's Motion to File Documents as Part of Record on Appeal and our Proof of Service to be filed regarding the above. We have also enclosed a check in the amount of \$25.00 to cover the filing fee. I would ask that you clock and return to me in the self-addressed, stamped envelope a copy of the above documents.

With kind regards, I am,

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

Ronald K. Wray, II

RKW:kd

Enclosures

cc: Mr. Robert Safi (w/enclosures, via email)
Mr. Mark B. Tinsley (w/enclosures)
Mr. Randolph Murdaugh, IV (w/enclosures)
Mr. Robert Hood, Jr. (w/enclosures)
Mr. Blake A. Hewitt (w/enclosures)

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COPY

The Honorable J. Michelle Childs
U.S. District Judge
300 East Washington Street
Greenville, SC 29601

Re: *George Skipper, Veronica Skipper, Michael Perry Bowers, Specialty Logging, LLC and Harold Moors vs. ACE Property and Casualty Insurance Company, Brantley C. Rowlen and Erin Lawson, COIA*
C.A. No.: 14-CP-03-008

Dear Judge Childs:

As you know, we represent ACE Property and Casualty Insurance Company in connection with the above-referenced case. This matter is currently before the South Carolina Supreme Court on the Certified Question you requested the Court consider. We are today filing a Motion pursuant to Rule 244(b), SCACR, requesting the Supreme Court to allow us to submit the confession of judgment and settlement agreement for review in considering the certified question. I am enclosing a copy of the motion for your convenience. Rule 244(b) provides that "[i]n the event a party believes that additional materials from the record before the certifying court are necessary, it shall notify the Supreme Court and certifying court so that the certifying court can determine if the additional materials will be submitted." Accordingly, in accordance with the Rules we are providing you with this motion for your consideration. Please let us know if you need anything further.

With kind regards, we are,

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.

Ronald K. Wray, II

RKW:kd
Enclosure

cc: The Honorable Daniel E. Shearouse, Clerk of Supreme Court
Mr. Robert Safi (w/enclosures, via email)
Mr. Mark B. Tinsley (w/enclosures)
Mr. Randolph Murdaugh, IV (w/enclosures)
Mr. Robert Hood, Jr. (w/enclosures)
Mr. Blake A. Hewitt (w/enclosures)

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S.C. Supreme Court

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CERTIFIED QUESTION FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

J. Michelle Childs, United States District Judge

APPELLATE CASE NO.: 2014-001979

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MAR 10 2015

S.C. Supreme Court

George Skipper, Veronica Skipper, Michael Perry
Bowers, Specialty Logging, LLC, and Harold Moors,

..... Plaintiffs,

v.

ACE Property and Casualty Insurance Company,
Brantley C. Rowlen, and Erin Lawson Coia,

..... Defendants.

MOTION OF DEFENDANT, ACE PROPERTY AND CASUALTY
INSURANCE COMPANY, TO FILE DOCUMENTS AS PART OF
RECORD ON APPEAL

Pursuant to Rule 244(b), SCACR, Defendant ACE Property and Casualty Insurance Company ("ACE"), hereby files this motion seeking permission to file certain documents referenced by the parties in their briefing as part of the record on appeal in this matter. Specifically, ACE seeks permission to file the following:


(1) Confession of Judgment signed by Plaintiffs Michael Perry Bowers, Harold Moors and Specialty Logging; and

(2) Settlement Agreement, Agreement to Stay Execution of Judgment and Springing Covenant not to Execute executed by and between the Plaintiffs.

Rule 244(b) provides that “[i]n the event a party believes that additional materials from the record before the certifying court are necessary, it shall notify the Supreme Court and the certifying court so that the certifying court can determine if the additional materials will be submitted.” Rule 244(b), SCACR. ACE respectfully submits that as these documents are discussed and referenced at length in the parties’ appellate briefs to this Court, and the documents are central to the question being addressed by the Court, allowing this Court to review these materials is necessary and will aid in the decisional process. In accordance with the requirements of Rule 244(b), SCACR, ACE also affirms that it will provide notice of this request to the Certifying Court so that the Certifying Court can determine if these materials should be submitted to this Court.

Respectfully submitted,

March 6, 2015



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Attorneys for Defendant,
ACE Property and Casualty Insurance Company

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

CERTIFIED QUESTION FROM THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

J. Michelle Childs, United States District Judge

APPELLATE CASE NO.: 2014-001979

George Skipper, Veronica Skipper, Michael Perry
Bowers, Specialty Logging, LLC, and Harold Moors,
..... Plaintiffs,

v.

ACE Property and Casualty Insurance Company,
Brantley C. Rowlen, and Erin Lawson Coia,
..... Defendants.

PROOF OF SERVICE

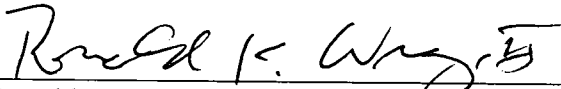
The undersigned hereby certifies that I have this 6th day of March, 2015, served copies of Defendant ACE Property and Casualty Insurance Company's Motion to file Document as Part of Record on Appeal upon counsel by causing them to be deposited in the United States Mail, first-class postage prepaid, addressed to:

Mr. Blake A. Hewitt
Bluestein Nichols Thompson & Delgado
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