



ROBERT H. HOOD, JR.
Managing Partner
(SC & NC)
DIRECT DIAL: (843) 577-1219
EMAIL: bobbyjr.hood@hoodlaw.com

March 9, 2015

RECEIVED

MAR 12 2015

S.C. Supreme Court

Via ECF Filing

The Honorable J. Michelle Childs
U.S. District Judge
901 Richland Street
Columbia, SC 29201

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
C/A No. 1:14-cv-00444-JMC
HLF File No. 3.243

Dear Judge Childs:

In response to the letter of Ronald Wray with the attached Motion to Attach Documents filed with the Supreme Court, Doc No 42, we have filed with the Supreme Court the attached Return of Defendants, Brantley C. Rowlen and Erin Lawson Coia. Pursuant to the Rules, we are filing a copy of our Return with this Court for your consideration. Please advise if you need any further information from us.

Kind regards,

Yours truly,

s/ **Robert H. Hood, Jr.**

Robert H. Hood, Jr.

RHHjr/spc
Enclosure

cc: The Honorable Daniel E. Shearouse, Clerk of Supreme Court
VIA ECF Notice:
Ronald K Wray, II, Esquire
Randolph Murdaugh, IV, Esquire
Mark B Tinsley, Esquire
Robert Rivera, Jr., Esquire
Robert S Safi, Esquire
Blake A. Hewitt, Esquire [*Via E-Mail*]

**STATE OF SOUTH CAROLINA
In the Supreme Court**

Certified Question from United States District Court

Honorable J. Michelle Childs, District Judge

App. 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.

**RETURN OF DEFENDANTS
BRANTLEY C. ROWLEN AND ERIN LAWSON COIA
TO DEFENDANT ACE PROPERTY'S MOTION
TO FILE DOCUMENTS AS PART OF RECORD ON APPEAL**

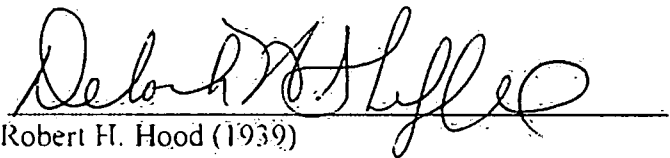
This matter is before the Court on a certified question from the U.S. District Court: Can a legal malpractice claim be assigned between adversaries in litigation in which the alleged legal malpractice arose? The Defendant Ace Property and Casualty Insurance has moved the Court pursuant to Rule 244 (b), SCACR, for permission to file certain documents from the underlying tort action for consideration by this Court in answering the certified question, namely: (1) the Confession of Judgment, and (2) the Settlement Agreement, Agreement to Stay Execution of Judgment, and Springing Covenant not to Execute.

The Defendants Coia and Rowlen have no objection to the motion inasmuch as these

documents are attached as exhibits "A" and "B" to the legal malpractice complaint and they are at the core of the assignment and settlement transaction that is at issue. However, the Defendants respectfully request that the entire complaint together with all attached exhibits be included for this Court's consideration. In support of this request, the Defendants would note that the District Court cited to the complaint extensively in the certification order, and it would be fair and reasonable for this Court to have the complete document for a comprehensive review in considering the issue presented.

Respectfully submitted,

HOOD LAW FIRM, LLC
172 Meeting Street
Post Office Box 1508
Charleston, SC 29402
Phone: (843) 577-4435
Facsimile: (843) 722-1630
Email: Info@hoodlaw.com



Robert H. Hood (1939)
Robert H. Hood, Jr. (6998)
Deborah Harrison Sheffield, *Of Counsel* (2757)

Attorneys for the Defendants
Brantley C. Rowlen and Erin Lawson Coia

March 9, 2015

Certificate of Service

The undersigned Counsel for the Defendants Coia and Rowlen certifies that on this 9th day of March, 2015, a copy of the foregoing Return was served by depositing said copy in the U.S. Mail, with sufficient first class postage, on the following counsel at the addresses listed below:

Blake A. Hewitt
BLUESTEIN NICHOLS
THOMPSON & DELGADO
P.O. Box 7965
Columbia, SC 29202

Randolph Murdaugh, IV
Peters, Murdaugh, Parker, Elzroth &
Detrick, PA
P.O. Box 457
Hampton, SC 29924

Mark B. Tinsely,
Gooding & Gooding, PA
P.O. Box 1000
Allendale, SC 29810

Ronald K. Wray, II
Gallivan, White & Boyd, PA
55 Beattie Place, Suite 1200
Greenville, SC 29603

Robert Rivera, Jr.
Susman Godfrey, LLP
1000 Louisiana Street, Suite 5100
Houston, Texas 77002-9366


Deborah H. Sheffield, Of Counsel (SC #2757)

HOOD
LAW FIRM
LLC

172 Meeting Street
Charleston, South Carolina 29401

Hasler

03/10/2015

US POSTAGE

FIRST-CLASS MAIL

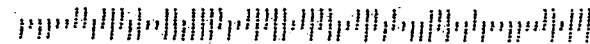
\$00.48⁰



ZIP 29401
011D11645571

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

2921131330 5099



3.243