

MARCH 9, 2015

S.C. Bar No. 2757

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

RECEIVED

MAR 12 2015

S.C. Supreme Court

Re: Skipper v. ACE Property, et al.; Appellate Case No. 2014-001979

Dear Clerk:

Enclosed for filing please find the original and six copies of the Return of Defendants Rowlen and Coia to Defendant ACE Property's MOTION TO FILE DOCUMENTS AS PART OF RECORD ON APPEAL. As evidenced by my Certificate of Service, I am serving Counsel for the Plaintiffs and Defendant ACE Property with a copy of this Return by mail. By separate cover, we are submitting the Return to the District Court through electronic filing.

With appreciation for your attention to this matter, I am

Sincerely yours,



Deborah H. Sheffield

cc:

Blake A. Hewitt
BLUESTEIN NICHOLS
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Randolph Murdaugh, IV
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1000 Louisiana Street, Suite 5100
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STATE OF SOUTH CAROLINA
In the Supreme Court

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MAR 12 2015

Certified Question from United States District Court **S.C. Supreme 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**

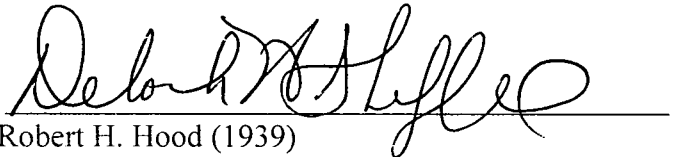
This matter is before the Court on a certified question from the U.S. District Court:
Can a legal malpractice claim be assigned between adversaries in litigation in which the
alleged legal malpractice arose? The Defendant Ace Property and Casualty Insurance has
moved the Court pursuant to Rule 244 (b), 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,

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A handwritten signature in black ink, appearing to read "Deborah H. Sheffield", is written over a horizontal line.

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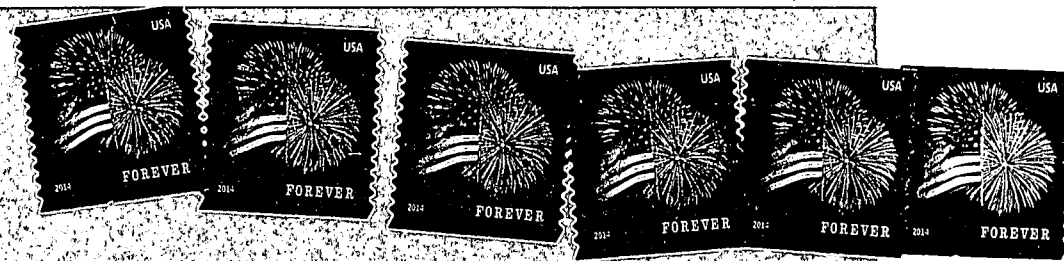
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Deborah H. Sheffield, *Of Counsel*, (SC #2757)



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