

THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY

COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS, JR.

RECEIVED
JUN 18 2015
SC Court of Appeals

Case No. 2013-CP-10-7203

Appeal Case No. 2014-001907

Nationwide Property & Casualty

Insurance Company, Plaintiff/Appellant

V.

Gary McCombs and Ragan McCombs Albert,

Defendants/Respondents

SUPPLEMENTAL RECORD ON APPEAL

TRACE DILLON
SC Bar No. 16857
Attorney for Appellant
THE DILLON LAW FIRM PC
1130 Hurricane Shoals Rd
Suite 600
Lawrenceville, GA 30043
(770) 513-6400 (Office)
(770) 513-6577 (Facsimile)
Trace@dillonlawfirm.com

Andrew Halio, Esq.
Law Office of Halio & Halio
PO Box 747
CHARLESTON, SC 29402
843/577-5200
Attorney for Respondent
Gary McCombs

Helen F. Hiser
735 Johnnie Dodds Blvd
Ste 200
Mount Pleasant SC 29464
843-476-2900
Attorney for Respondent
Ragan McCombs Albert

Robert R. Sansbury
McAngus, Goudlock & Courie
LLC
735 Johnnie Dodds Blvd.
Suite 200
Mount Pleasant SC 29464
843-576-2900
Attorneys for Respondent
Ragan McCombs Albert

STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
 Nationwide Property & Casualty)
 Insurance Company,)
)
 Plaintiff,)
)
 vs.)
)
 Gary McCombs and Ragan)
 McCombs Albert,)
)
 Defendants.)

IN THE COURT OF COMMON PLEAS
 FOR THE NINTH JUDICIAL CIRCUIT
 CASE NO: 2013-CP-10-7203

FILED
 2014 JUL 14 AM 11:32
 JULIE J. ARISTARONG
 CLERK OF COURT
 BY _____

MOTION FOR SUMMARY JUDGMENT

HALIO & HALIO, CHARLESTON, SOUTH CAROLINA

Pursuant to Rule 56, SCRPC, the Defendant, Gary McCombs, moves the Court for an Order granting summary judgment in his favor on the ground that there is no genuine issue of material fact, and he is entitled to judgment as a matter of law. Specifically, there is no evidence of any negligence on his part that caused or contributed to the damages claimed by the Plaintiff in this case, nor are there any witnesses listed by the Plaintiff who could so testify. This motion is supported by the pleadings and discovery, including the affidavit of Gary McCombs attached hereto and filed contemporaneously herewith.

HALIO AND HALIO
 Attorneys for Gary McCombs

Andrew S. Halio

 ANDREW S. HALIO
 13 North Adgers Wharf Box 747
 Charleston, SC 29402-0747
 (843) 577-5200

July 14, 2014
 Charleston, South Carolina

2013-CP10-2203

AFFIRMATION

I affirm that consultation with opposing counsel is not necessary prior to the filing of this motion.

Andrew S. Halio
ANDREW S. HALIO

CERTIFICATION

This is to certify that the undersigned attorneys did this date serve the *Motion for Summary Judgment* upon the attorneys below listed by mailing a copy of the same to their address, postage prepaid on July 14, 2014:

Trace Dillon
1130 Hurricane Shoals Rd
Suite 600
Lawrenceville, GA 30043

Robert R. Sansbury, III
735 Johnnie Dodds Blvd., Suite 200
Mt. Pleasant, SC 29465

BY _____
JULIE J. ARMSTRONG
CLERK OF COURT
2014 JUL 14 AM 11:32

FILED

Andrew S. Halio
ANDREW S. HALIO

HALIO & HALIO, CHARLESTON, SOUTH CAROLINA

THE STATE OF SOUTH CAROLINA

COURT OF APPEALS

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Defendants/Respondents

Certificate of Service

This is to certify that I have this day served a copy
of the Supplemental Record on Appeal by U.S. Mail,
sufficient postage prepaid and addressed as follows:


Andrew Halio, Esq.
Law Office of Halio & Halio
PO Box 747
CHARLESTON, SC 29402
843/577-5200
Attorney for Respondent Gary McCombs

Helen F. Hiser
735 Johnnie Dodds Blvd

Ste 200
Mount Pleasant SC 29464
843-476-2900
Attorney for Respondent Ragan McCombs Albert

Robert R. Sansbury
McAngus, Goudlock & Courie LLC
735 Johnnie Dodds Blvd.
Suite 200
Mount Pleasant SC 29464
843-576-2900
Attorneys for Respondent Ragan McCombs Albert

Dated this 16 day of Jan, 2015.

BY: 
TRACE DILLON
Bar No. 16857
Attorney for Appellant
THE DILLON LAW FIRM PC
1130 Hurricane Shoals Rd
Suite 600
Lawrenceville, GA 30043
(770) 513-6400 (Office)
(770) 513-6577 (Facsimile)

Trace Dillon, Esq.
Admitted to GA, SC & TN
Bars

THE DILLON LAW FIRM, PC
ATTORNEYS AT LAW

1130 Hurricane Shoals Rd
Suite 600
Lawrenceville, GA 30043

Toll Free (855) 591-0067
Facsimile (770) 513-6577
trace@dillonlawfirmpc.com
www.dillonlawfirmpc.com

June 16, 2015

VIA FIRST CLASS MAIL

Clerk of Court of Appeals
1015 Sumter Street
Columbia SC 29201

RE: NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY
VS. GARY MCCOMBS
RAGAN MCCOMBS ALBERT
Robert G. Albert
Our File No.: 13001448
Appeal Case Number: 2014-001907

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SC Court of Appeals

Dear Clerk:

Please find documents for filing.

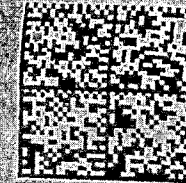
Should you have any questions, please feel free to call.

Sincerely yours,
THE DILLON LAW FIRM PC


TRACE DILLON

cc: Andrew Steven Halio
Robert Rhett Sansbury, III
Helen Faith Hiser





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The Dillon Law Firm PC
2346 Wisteria Ave
Suite 220
Snellville GA 30078

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