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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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JUN 22 2015  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable R. Markley Dennis, Jr.

Case No. 2013-CP-10-7203

Nationwide Property & Casualty  
Insurance Company, .....Appellant,

v.

Gary McCombs and Ragan McCombs Albert, ..... Respondents.

**MOTION FOR CORRECTION  
OF RECORD ON APPEAL**

Pursuant to Rule 210, SCACR, Respondent Ragan McCombs Albert ("Respondent Albert") moves this Court to order Appellant Nationwide Property & Casualty Insurance Company to correct the Record on Appeal ("ROA"). In a prior motion, dated May 11, 2015, (Att. A), Respondent Albert moved this Court to order Appellant to include in the ROA the following document: Defendant Ragan McCombs Albert's Motion for Summary Judgment, filed July 15, 2014. As noted in the prior motion, Respondent Albert designated this Motion to be included in the ROA and cites to the Motion for Summary Judgment in her Brief to this Court.

In an order dated May 28, 2015, this Court granted Respondent Albert's prior motion. However, the Supplemental Record on Appeal filed by Appellant contains only a Motion for Summary Judgment filed by Respondent Gary McCombs. (Att. B). It does not contain the

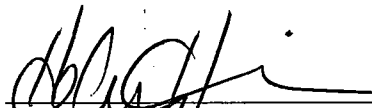
Defendant Ragan McCombs Albert's Motion for Summary Judgment, filed July 15, 2014. In addition, the Supplemental Record on Appeal is not numbered and does not contain a Certificate of Counsel as required by Rule 210(c) & (g), SCACR.

Respondent Albert requests this Court to order Appellant to correct the ROA to include the Defendant Ragan McCombs Albert's Motion for Summary Judgment, filed July 15, 2014. Respondent Albert further requests this Court to order that the Final Briefs in this appeal will not be due until the Record on Appeal has been properly corrected.

This motion conforms with Rule 240, SCACR.

Respectfully submitted,  
MCANGUS GOUDELCK & COURIE

June 19, 2015



---

Helen F. Hiser  
S.C. Bar No.: 76124  
Robert R. Sansbury, III  
S.C. Bar No.: 77384  
McAngus Goudelock & Courie, L.L.C.  
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P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Respondent Ragan McCombs Albert*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM SOUTH CAROLINA  
WORKERS' COMPENSATION COMMISSION

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W.C.C. File No.: 1205798

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**RECEIVED**  
JUN 22 2015  
SC Court of Appeals

Briett Johnson, Employee, .....Appellant,

v.

Pike Electric, Inc., Employer, and  
Liberty Mutual Insurance Company, Carrier, ..... Respondents.

---

**FINAL BRIEF OF RESPONDENTS**

---

MCANGUS GOUDELICK & COURIE, LLC  
Weston Adams, III  
Meridian 10<sup>th</sup> Floor  
1320 Main Street  
P.O. Box 12519  
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501 South Irby Street, 2nd Floor  
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843-519-1800

*Attorneys for Respondents Pike Electric, Inc. and  
Liberty Mutual Insurance Company*

McAngus, Goudelock & Courie LLC  
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Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Respondent Ragan McCombs Albert*

# **Attachment A**

75968

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable R. Markley Dennis, Jr.

Case No. 2013-CP-10-7203

**RECEIVED**  
MAY 13 2015  
SC Court of Appeals

Nationwide Property & Casualty  
Insurance Company, ..... Appellant,

v.

Gary McCombs and Ragan McCombs Albert, ..... Respondents.

**MOTION FOR CORRECTION AND/OR AMENDMENT  
OF RECORD ON APPEAL**

Pursuant to Rule 210, SCACR, Respondent Ragan McCombs Albert ("Respondent Albert") moves this Court to order that the following corrections be made to the Record on Appeal ("ROA"):

1. Defendant Ragan McCombs Albert's Motion for Summary Judgment, filed July 15, 2014 is missing. Respondent Albert designated this Motion to be included in the ROA and cites to the Motion in her Brief.

Respondent Albert requests this Court to order Appellant to correct and/or amend the ROA as outlined above. Respondent Albert further requests this Court to order that the Final Briefs in this appeal will not be due until the Record on Appeal has been properly corrected and/or amended.

This motion conforms with Rule 240, SCACR.

Respectfully submitted,  
MCANGUS GOUDELICK & COURIE

May 11, 2015



Helen F. Hiser

S.C. Bar No.: 76124

Robert R. Sansbury, III

S.C. Bar No.: 77384

McAngus Goudelock & Courie, L.L.C.

735 Johnnie Dodds Blvd., Suite 200

P.O. Box 650007

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*Attorneys for Respondent Ragan McCombs Albert*

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**  
MAY 13 2015  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable R. Markley Dennis, Jr.

Case No. 2013-CP-10-7203

Nationwide Property & Casualty  
Insurance Company, .....Appellant,

v.


Gary McCombs and Ragan McCombs Albert, ..... Respondents.

**PROOF OF SERVICE**

I certify that on the 11th day of May 2015, I served the **Motion for Correction and/or Amendment of Record on Appeal** by depositing copies of the same in the United States Mail, postage prepaid, addressed to the following:

Trace Dillon, Esq.  
1130 Hurricane Shoals Road  
Suite 600  
Lawrenceville, Georgia 30043  
*ATTORNEY FOR APPELLANT*

Andrew S. Halio, Esq.  
Halio & Halio  
Post Office Box 747  
Charleston, South Carolina 29402  
*ATTORNEY FOR RESPONDENT GARY MCCOMBS*

  
\_\_\_\_\_  
Jany L. Richards  
Legal Assistant to Helen F. Hiser

McAngus, Goudelock & Courie LLC  
735 Johnnie Dodds Blvd., Suite 200  
P.O. Box 650007  
Mount Pleasant, South Carolina 29465  
(843) 576-2900

*Attorneys for Respondent Ragan McCombs Albert*

# mgc

**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

May 11, 2015

**RECEIVED**

MAY 13 2015

SC Court of Appeals

**Via U.S. Mail**

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

RE: Nationwide Property & Casualty Insurance Company v. Gary McCombs  
et al.  
Civil Action No.: 2013-CP-10-7203  
Appeal No.: 2014-001907  
MGC File No.: 20527.14072

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondent Ragan  
McCombs Albert's Motion for Correction and/or Amendment of Record on Appeal, and  
the original and one copy of the Proof of Service in the above-referenced matter.  
Please file the originals and return a clocked-in copy in the self-addressed, stamped  
envelope. Also enclosed is our firm's check in the amount of \$25 for filing the motion.

If you have any questions, please do not hesitate to contact me.

Yours truly,  
McAngus Goudelock & Courie, LLC



Helen F. Hiser

HFH/mmm

cc: Trace Dillon, Esq.  
Andrew S. Halio, Esq.

MCANGUS GOUDELOCK & COURIE LLC

735 JOHNNIE DODDS BLVD. SUITE  
200  
POST OFFICE BOX 650007  
MT. PLEASANT, SC 29465

843.576.2900 PHONE  
843.534.0505 FAX  
WWW.MGCLAW.COM

**mgc**

POST OFFICE BOX 650007  
MOUNT PLEASANT, SC 29465

**20527.14072/HFH/jlr**  
The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

**RECEIVED**

MAY 13 2015

**SC Court of Appeals**

# **Attachment B**

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@dillonlawfirm.com  
www.dillonlawfirm.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

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



THE STATE OF SOUTH CAROLINA  
COURT OF APPEALS

---

APPEAL FROM CHARLESTON COUNTY

COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS, JR.

---

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

MOTION FOR SUMMARY JUDGMENT

FILED  
2014 JUL 14 AM 11:32  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

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  
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

FILED  
2014 JUL 14 AM 11:32  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

*Andrew S. Halio*  
ANDREW S. HALIO

HALIO & HALIO, CHARLESTON, SOUTH CAROLINA

THE STATE OF SOUTH CAROLINA  
COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY

COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS, JR.

---

Case No. 2013-CP-10-7203

Appeal Case No. 2014-001907

Nationwide Property & Casualty  
Insurance Company, Plaintiff/Appellant

V.

Gary McCombs, Ragan McCombs and Robert G Albertt,  
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: TD  
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)

THE STATE OF SOUTH CAROLINA  
COURT OF APPEALS

APPEAL FROM CHARLESTON COUNTY  
COURT OF COMMON PLEAS  
HONORABLE R. MARKLEY DENNIS, JR.

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JUN 22 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, Ragan McCombs and Robert G Albertt,  
Defendants/Respondents

**Notice of Change of Address and Certificate of Mailing**

Counsel for Appellant hereby notifies this court and  
opposing counsel that its address has changed as follows:

And this is to certify that I have this day served a copy  
of the Notice of Change of Address 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 June, 2015.

BY:   
TRACE DILLON  
Bar No. 16857  
Attorney for Appellant  
THE DILLON LAW FIRM-PC  
2346 Wisteria Ave Suite 220  
Snellville, GA 30078  
(770) 513-6400 (Office)  
(770) 513-6577 (Facsimile)

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Honorable R. Markley Dennis, Jr.

---

Case No. 2013-CP-10-7203

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**RECEIVED**  
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SC Court of Appeals

Nationwide Property & Casualty  
Insurance Company, .....Appellant,

v.

Gary McCombs and Ragan McCombs Albert, ..... Respondents.

---


**PROOF OF SERVICE**

---

I certify that on the 19th day of June 2015, I served the **Motion for Correction of Record on Appeal** by depositing copies of the same in the United States Mail, postage prepaid, addressed to the following:

Trace Dillon, Esq.  
2346 Wisteria Ave.  
Suite 220  
Shellville, Georgia 30078  
*ATTORNEY FOR APPELLANT*

Andrew S. Halio, Esq.  
Halio & Halio  
P.O. Box 747  
Charleston, South Carolina 29402  
*ATTORNEY FOR RESPONDENT GARY MCCOMBS*

  
\_\_\_\_\_  
Jami L. Richards  
Legal Assistant to Helen F. Hiser



**Reply To**

HELEN F. HISER  
Direct Dial: (843) 576-2930  
helen.hiser@mgclaw.com

June 19, 2015

**RECEIVED**

JUN 22 2015

SC Court of Appeals

**Via U.S. Mail**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
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RE: Nationwide Property & Casualty Insurance Company v. Gary McCombs  
et al.  
Civil Action No.: 2013-CP-10-7203  
Appeal No.: 2014-001907  
MGC File No.: 20527.14072  
Appeal No.: 2014-001907

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondent Ragan McCombs Albert's Motion for Correction of Record on Appeal, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the self-addressed, stamped envelope. Also enclosed is our firm's check in the amount of \$25 for filing the motion.

If you have any questions, please do not hesitate to contact me.

Yours truly,  
McAngus Goudelock & Courie, LLC



Helen F. Hiser

cc: Trace Dillon, Esq.  
Andrew S. Halio, Esq.

P

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Mt. Pleasant SC 29464

Delivery Date: 06/22/2015

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nc Court GO76eals  
The Honorable Jenny Abbott Kitchings  
South Carolina Court Of Appeals  
1220 Senate St  
Columbia SC 29201-3723

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