

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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**APPEAL FROM LAURENS COUNTY  
COURT OF COMMON PLEAS**

**R. Lawton McIntosh  
Circuit Court Judge**

**RECEIVED**

JUL 22 2015

SC Court of Appeals

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**CASE NO. 2015-000788**

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**JUAN MICHAEL RAMIREZ, ..... Appellant,**

**v.**

**PROGRESSIVE NORTHERN  
INSURANCE COMPANY, ..... Respondent.**

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**Designation of Matter to be  
Included in the Record on Appeal**

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**Edwin L. Turnage  
HARRIS & GRAVES, P.A.  
812 Laurens Road  
Greenville, SC 29607  
(864) 235-1331**

**Attorney for Appellant**

Appellant proposes the following be included in the Record on Appeal:

Laurens County Judicial Circuit Public Index for Ramirez v. Progressive  
Order of March 17, 2015  
Judgment of February 19, 2015;  
Summons;  
Complaint;  
Answer (with Attached Release)  
Reply;  
Defendant's Motion for Judgment on the Pleadings;  
Defendant's Motion to Dismiss Breach of Contract Cause of Action;  
Memorandum in Opposition to Defendant's Motion to Strike and Motion to Dismiss  
Notice of Appeal  
Transcript of Record  
Exhibit 1 (Offer of underinsured motorist coverage to Kandi Ramirez signed 2/28/13)  
Exhibit 2 (SCDOI Bulletin No. 2006-03)  
Defendant's Answers to Discovery Request of Plaintiff (Oct. 23, 2014)  
Defendant's Supplemental Answers to Interrogatories (Dec. 5, 2014)  
Memorandum of June 24, 2014

I certify that this designation contains no matter which is irrelevant to this appeal.

July 27, 2015



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**CASE No. 2015-000788**

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**JUAN MICHAEL RAMIREZ, .....Appellant,**

**v.**

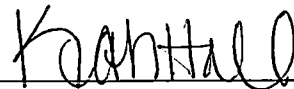
**PROGRESSIVE NORTHERN  
INSURANCE COMPANY, ..... Respondent.**

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**PROOF OF SERVICE**

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I certify that I have served the Designation of Matter to be Included in the Record on Appeal and Initial Brief of Appellant on Progressive Northern Insurance Company by depositing a copy of it in the United States Mail, postage prepaid, on July 20, 2015, addressed to its attorney of record, Bradley L. Lanford, Baker, Ravenel & Bender, LLP, Post Office Box 8057, Columbia, SC 29202.



Karie L. Hall  
Paralegal to  
Edwin L. Turnage  
HARRIS & GRAVES, P.A.  
812 Laurens Road  
Greenville, SC 29607  
(864) 235-1331  
Attorney for Appellant

Date: July 20, 2015

LAW OFFICES

**HARRIS AND GRAVES, P.A.**

"Our mission is to provide exceptional personal and professional service to our clients"

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OF COUNSEL  
E. WESLEY GRAVES, III

RETIRED  
SHIPP D. HARRIS

July 20, 2015

The Honorable Jenny Abbott Kitchings  
Clerk of Court for SC Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

RECEIVED

JUL 22 2015

SC Court of Appeals

RE: *Juan Michael Ramirez vs. Progressive*  
Case Number: 2015-000788  
Our File #: 201339345

Dear Ms. Kitchings:

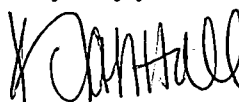
Enclosed please find the following documents:

1. Designation of Matter to be Included in the Record on Appeal;
2. Initial Brief of Appellant; and
3. Proof of Service of the Designation and Brief on Respondent.

Please file these documents and return the clocked copies to us in the envelope provided for your convenience.

Thank you for your time and assistance in this matter.

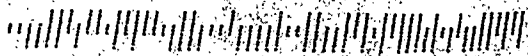
Very truly yours,



Karie L. Hall  
Paralegal

Enclosures

cc: Bradley L. Lanford  
P.O. Box 8057  
Columbia, SC 29202  
Attorney for Respondent



**HARRIS AND GRAVES, P.A.**

P.O. BOX 6263

GREENVILLE, S.C. 29606

The Honorable Jenny Abbott Kitchings  
Clerk of Court for SC Court of Appeals  
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