

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

RECEIVED

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

AUG 17 2015

R. Lawton McIntosh, Circuit Court Judge

SC Court of Appeals

Case No. 2015-000788

Juan Michael Ramirez,Appellant,

v.


Progressive Northern Insurance
Company.....Respondent.

**DESIGNATION OF MATTER TO BE INCLUDED IN THE
RECORD ON APPEAL**

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

- Summons & Complaint (08/04/14);
- Answer with attached Release (09/11/14);
- Defendant's Motion to Dismiss Breach of Contract Cause of Action (09/11/14);
- Defendant's Motion to Strike (09/11/14);
- Plaintiff's Memorandum in Opposition to Motion to Strike and Motion to Dismiss (09/11/14);
- Reply (10/08/14);
- Answers to Discovery Requests of Plaintiff (10/23/14);
- Supplemental Answers to Interrogatories of Plaintiff (12/05/14);
- Defendant's Motion for Judgment on the Pleadings (10/20/14);
- Form 4 Order on Motion for Judgment on the Pleadings;
- Order (Motion for Judgment on the Pleadings); and
- Transcript of Record.

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


Bradley L. Lanford
BAKER, RAVENEL & BENDER, L.L.P.
Post Office Box 8057
Columbia, SC 29202
803.799.9091 (telephone)
803.779.3423 (facsimile)
blanford@brblegal.com
ATTORNEYS FOR RESPONDENT

August 17, 2015

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LAURENS COUNTY
Court of Common Pleas

R. Lawton McIntosh, Circuit Court Judge

Case No. 2015-000788

RECEIVED
AUG 17 2015
SC Court of Appeals

Juan Michael Ramirez,Appellant,

v.

Progressive Northern Insurance
Company.....Respondent.

PROOF OF SERVICE

I, Bradley L. Lanford, attorney for Respondent, do hereby certify that I have served on this 17th day of August 2015, a copy of the Initial Brief of Respondent and Designation of Matter to be Included in the Record on Appeal upon counsel for Appellant by delivering via U.S. Mail, first class postage pre-paid, to said counsel at the following address:

Edwin L. Turnage, Esquire
Harris & Graves, P.A.
PO Box 6263
Greenville, SC 29606


Bradley L. Lanford
BAKER, RAVENEL & BENDER, L.L.P.
Post Office Box 8057
Columbia, SC 29202
803.799.9091 (telephone)
803.779.3423 (facsimile)
blanford@brblegal.com
ATTORNEYS FOR RESPONDENT

August 17, 2015