

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY  
Paul M. Burch, Circuit Court Judge

\_\_\_\_\_  
Appellate Case No. 2015-000806  
\_\_\_\_\_

**RECEIVED**  
SEP 30 2015  
SC Court of Appeals

Ard Trucking Company ..... Respondent,

v.

Travelers Property Casualty Company  
of America d/b/a The Travelers Indemnity  
Company of Illinois, Appellant. .... Appellant.

\_\_\_\_\_  
APPELLANT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL  
\_\_\_\_\_

Barnwell Whaley Patterson & Helms, LLC  
Phillip S. Ferderigos, Esquire  
P.O. Drawer H  
Charleston, SC 29401  
843-577-7700  
*Attorney for Appellant*

Driggers & Moyd  
Martin S. Driggers, Sr., Esquire  
P.O. Box 1439  
Hartsville, SC 29551  
843-332-5151  
*Attorney for Respondent*

Appellant proposes the following Designation of Matter to be included in the Record on Appeal:

1. Summary Judgment Order in Favor of Plaintiff dated February 5, 2015
2. Order Denying Motion for Reconsideration dated March 20, 2015, filed March 24, 2015
3. Draft Proposed Order Granting Travelers' Motion for Summary Judgment and Judgment of \$160,908.20 in favor of Travelers
4. Transcript of Record dated December 18, 2014
5. Motion for Summary Judgment for Travelers filed September 16, 2014
6. Travelers' Memorandum in Support of its Motion for Summary Judgment and accompanying exhibits/documents
7. Affidavits of Roshani B. Ghayal, Frederick J. Moylen, and Steve V. Evangelista, APA
8. Affidavit of Harry Brown
9. Travelers' Motion for Reconsideration pursuant to SCRPC Rules 59 and 59 of SCRPC dated March 2, 2015, filed March 5, 2015
10. S.C. Department of Insurance Approved LSRP Plan, SCDOI 001-0040
11. Workers' Compensation Insurance Plan (WCIP) Rule 4 and Section 1 "Duties and Responsibilities Under the Plan: The Producer's and Agency's Duties and Responsibilities."

We certify that this Designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

By: \_\_\_\_\_

Phillip S. Ferderigos  
Barnwell Whaley Patterson & Helms, LLC  
288 Meeting Street, Suite 200  
Charleston, SC 29401  
P.O. Drawer H (29402)  
(843) 577-7700  
*Counsel for the Appellant*

Dated: September 28, 2015

**Other Counsel of Record:**

Driggers & Moyd  
Martin S. Driggers, Sr., Esquire  
P.O. Box 1439  
Hartsville, SC 29551  
843-332-5151  
*Counsel for Respondent*



Phillip S. Ferderigos, Partner  
PFerderigos@barnwell-whaley.com

September 28, 2015

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SC Court of Appeals

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

RE: Ard Trucking Company, Respondent  
v.  
Travelers Property Casualty Company of America d/b/a The Travelers Indemnity Company of Illinois, Appellant  
Appellate Court Case No. 2015-000806

Dear Ms. Kitchings:

Please find enclosed the original and three copies of the Initial Brief of Appellant and the Appellant's Designation of Matter to be Included in the Record on Appeal. Please file the originals and two copies of each and return one copy of each to me in the envelope provided herein.

Thank you for your assistance.

With kind regards,

Phillip S. Ferderigos

Enc.

Cc w/enc.: Martin S. Driggers, Sr., Esq.

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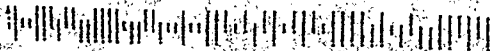
M. Dawes Cooke, Jr.  
B.C. Killough\*  
Randell C. Stoney, Jr.  
Phillip S. Ferderigos  
K. Michael Barfield  
David S. Cox

William C. Helms, III\*

\* Registered patent attorney  
\* Retired

Ernest B. Lipscomb, III\*  
J. Gail Rahn  
John A. Jones  
Lucinda D. Gardner  
John W. Fletcher

Alissa D. Fleming  
Barbara J. Wagner, Ph.D.  
Jeremy E. Bowers  
D. Summers Clarke, II  
Jeffrey M. Bogdan  
Bradley B. Banias



**BARNWELL  
WHALEY** | **75** YEARS ■  
PATTERSON & HELMS LLC 1938-2013

P.O. Drawer H, Charleston, SC 29402-0197

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SC Court of Appeals

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