

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough
Charleston County Master-In-Equity

Case No.: 2007-CP-10-3224
Appellate Case No.: 2015-001383

RECEIVED
OCT 23 2015
SC Court of Appeals

Jana Wright, as Guardian ad Litem for Travis M.,
a minor over the age of 14 years. Plaintiff,

v.

Tema Brown. Respondent,

v.

GeoVera Specialty Insurance Co. Appellant.

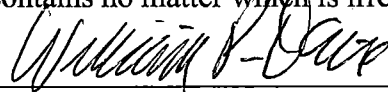
**DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

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

- (1) Complaint;
- (2) Affidavit of Service on Tema Brown;
- (3) September 28, 2006 letter to Tema Brown;
- (4) September 28, 2006 letter to Barry Baker;
- (5) January 10, 2008 Order of Default;
- (6) December 5, 2008 Motion for an Order of Reference to Special Referee;
- (7) March 11, 2009 Order of Reference to Special Referee;
- (8) September 11, 2009 Order of Judgment;
- (9) November 4, 2010 Assignment;
- (10) January 6, 2011 Order/Judge Dennis;
- (11) July 14, 2011 Order/Judge Harrington;
- (12) Answer and Third-Party Complaint;
- (13) December 9, 2011 Order;

- (14) Amended Third-Party Complaint;
- (15) Amended Answer of Constitution State to Amended Third-Party Complaint;
- (16) Answer of GeoVera to Amended Third-Party Complaint;
- (17) Amended Answer of GeoVera to Amended Third-Party Complaint;
- (18) December 18, 2012 Consent Order;
- (19) GeoVera's Motion Summary Judgment and Memorandum in Support;
- (20) Tema Brown's Motion for Summary Judgment;
- (21) March 24, 2015 Corrected Order;
- (22) Motion for Reconsideration and to Alter or Amend Judgment (as to Corrected Order);
- (23) Order Denying Third-Party Defendant's Motion for Reconsideration and to Alter or Amend Judgment;
- (24) USF&G Specialty Insurance Company policy number GH20051152;
- (25) MUSC record of April 20, 2005;
- (26) DHEC record of April 20, 2005;
- (27) Peter C. de Vito, June 20, 2005 office note;
- (28) April 29, 2005 letter of Barry Baker;
- (29) Transcript of May 10, 2005 Recorded Statement of Tema Brown;
- (30) July 28, 2005 Reservation of Rights Letter;
- (31) Affidavit of Brenda Trawick-Smith with Exhibits A and B;
- (32) April 7, 2008 Letter Reiterating Denial;
- (33) Order of Referral;
- (34) September 11, 2009 Order of Judgment;
- (35) Defendant/Third-Party Plaintiff's Answers to GeoVera's Discovery, Request for Production 9;
- (36) Defendant/Third-Party Plaintiff's Answers to GeoVera's Discovery, Interrogatory 9.
- (37) Answer of GeoVera to Third-Party Complaint;
- (38) Order Denying Third-Party Defendant's Motion for Reconsideration and to Alter or Amend Judgment;
- (39) Transcript of May 19, 2014 Hearing;
- (40) Transcript of May 13, 2015 Hearing.

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



William P. Davis SC Bar No.: 1585
 BAKER, RAVENEL & BENDER, L.L.P.
 3710 Landmark Drive, Suite 400
 Post Office Box 8057
 Columbia, South Carolina 29202
 Phone: (803) 799-9091; Fax: (803) 779-3423
wdavis@brblegal.com File No.: 7746.1857
Attorneys for Appellant

Columbia, SC
 October __, 2015

Other Counsel of Record:

Amanda R. Maybank, Esquire
Roy P. Maybank, Esquire
Maybank Law Firm, LLC
P.O. Box 12579
Charleston, SC 29422

Barry I. Baker, Esquire
P.O. Box 31265
Charleston, SC 29417
Attorneys of Record for Plaintiff

Andrew K. Epting, Jr., Esquire
Michelle N. Endemann, Esquire
Andrew K. Epting, Jr., LLC
46A State Street
Charleston, SC 29401
Attorneys of Record for Defendant/Third-Party Plaintiff and Respondent

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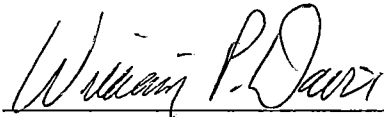
PROOF OF SERVICE

I, William P. Davis, attorney of Baker, Ravenel & Bender, L.L.P., attorneys for Appellant, do hereby certify that on the 23rd day of October 2015, I have served the following with the foregoing Initial Brief of Appellant, Designation of Matter to be Included in the Record on Appeal, and Proof of Service by mailing copies of same by United States Mail, postage prepaid, to counsel of record at the addresses shown below:

Amanda R. Maybank, Esquire
Roy P. Maybank, Esquire
Maybank Law Firm, LLC
P.O. Box 12579
Charleston, SC 29422

Barry I. Baker, Esquire
P.O. Box 31265
Charleston, SC 29417

Andrew K. Epting, Jr., Esquire
Michelle N. Endemann, Esquire
Andrew K. Epting, Jr., LLC
46A State Street
Charleston, SC 29401



William P. Davis SC Bar No.: 1585
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
Phone: (803) 799-9091; Fax: (803) 779-3423
wdavis@brblegal.com File No.: 7746.1857
Attorney for Appellant GeoVera Specialty Insurance Co.