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SC Court of Appeals

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

Juan Michael Ramirez,

Appellant,

v.

Progressive Northern
Insurance Company,


Respondent.

STIPULATION

WHEREAS, the parties seek to avoid the cost of litigating the underlying litigation between Juan Michael Ramirez and John S. Bryan, Jr., they hereby stipulate that Appellant would have obtained a judgment against Mr. Bryan that would have exhausted all applicable coverages, including and up to the coverage at issue in this case. This Stipulation is not intended to modify or supplement the Policy Release signed by Appellant which is a part of the Record on Appeal, but to alleviate the need for additional unnecessary litigation between Appellant and Mr. Bryan.

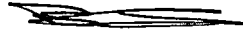
WE SO STIPULATE

Feb.
January 2, 2016



Edwin L. Turnage
HARRIS & GRAVES, P.A.
812 Laurens Road
Greenville, South Carolina 29607
(864) 235-1331
Attorney for Appellant

January 27, 2016



Bradley L. Lanford
BAKER, RAVENEL & BENDER, LLP
Post Office Box 8057
Columbia, South Carolina 29202
(803) 799-9091
Attorney for Respondent

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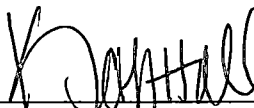
SC Court of Appeals

CERTIFICATE OF SERVICE

Karie Hall says that she is the Paralegal for the Attorney for the Plaintiff, with offices at Greenville, SC, and that on February 2, 2016, she mailed in a sealed envelope, postage prepaid, a copy of a Stipulation to:

Bradley L. Lanford
Baker, Ravenel & Bender, LLP
Post Office Box 8057
Columbia, SC 29202

name and address of opposing counsel.



Karie L. Hall

LAW OFFICES

HARRIS AND GRAVES, P.A.

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

MITCHELL J. WILLIAMS
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*Also Licensed in North Carolina

February 2, 2016

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SC Court of Appeals

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

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

Dear Ms. Kitchings:

Pursuant to the request of counsel for Respondent, I am enclosing the original and two copies of Stipulation which I would appreciate your filing in this case. Please return the clocked copies to me in the envelope provided for your convenience.

By copy of this letter, I am hereby serving opposing counsel.

Thank you for your time and assistance in this matter.

Very truly yours,



EDWIN L. TURNAGE
elt@harrisgraves.com

Enclosures

cc: Bradley L. Lanford, Esq.

HARRIS AND GRAVES, P.A.

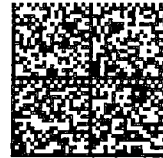
P.O. BOX 6263
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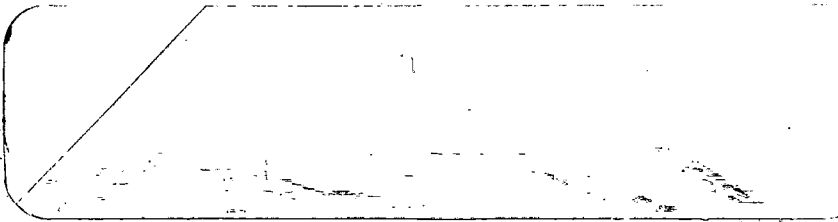
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