

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Clayton B. McCullough, Esquire, Special Referee

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Case No. 2016-000063

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RECEIVED

JUN 06 2016

SC Court of Appeals

Anna Angelacci, as guardian of K.B., a minor, Respondent,

v.

E.U., a minor, Travis O. Felkel, and Ginger G. Ulery, Defendants.

Ex parte: Nationwide Mutual Fire Insurance Company, Appellant.

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RESPONDENT'S DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

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Pursuant to Rule 209, SCACR, Respondent proposes that the following be  
including in the Record on Appeal:

1. Summons and Complaint
2. Affidavits of Service of Summons and Complaint on Travis Felkel, Ginger Ulery and E.U., a minor on December 2, 2014 completed by process server Michael A. Lamont
3. Affidavit of David B. Yarborough, Jr., Esquire and Motion for Entry of Default and Referral, dated January 7, 2015
4. Entry of Default and Order of Referral to Special Referee, dated January 7, 2015

5. Order of Default Judgment as to Travis Felkel and Ginger Ulery, dated April 23, 2015
6. Order Appointing Guardian ad Litem, dated June 8, 2015
7. Motion for Default Judgment against E.U. and Notice of Hearing, dated June 9, 2015
8. Order of Default Judgment as to E.U., dated June 25, 2015
9. Respondents' Memorandum in Opposition to Motion to Intervene and Set Aside Default
10. Order Denying Nationwide's Motion to Remove Case from Special Referee, dated December 7, 2015
11. Order Denying Nationwide's Motion to Intervene and Set Aside Default, dated January 3, 2016
12. Order Denying Nationwide's Motion to Reconsider, dated January 14, 2016
13. Nationwide Homeowners Insurance Policy
14. Deposition of John Herndon, p. 14, 29, 30, 31, 32, 33, 34, 35, 44, 39, 81
15. Affidavit of Travis Felkel, dated November 24, 2015
16. Affidavit of Mike Lamont
17. Assignment of Claims as to Felkel
18. Assignment of Claims as to Ulery
19. Assignment of Claims as to E.U.
20. Nationwide Reservation of Rights letters, dated September 2, 2015
21. Bad Faith Complaint
22. Nationwide's Amended Answer and Counterclaim, dated January 6, 2016
23. Transcript of Hearing On Motion to Intervene and Set Aside Default, pp. 65-67

24. Letter and Notice of Hearing Sent By Respondents' Counsel to Ginger Ulery on June 15, 2015

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



YARBOROUGH APPELATE LLC

David B. Yarborough, Jr.

Lydia Blessing Applegate

Douglas E. Jennings

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Charleston, South Carolina 29401

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*Attorneys for Respondent*

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PROOF OF SERVICE OF INITIAL BRIEF OF RESPONDENT


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I certify that I have served the Initial Brief of Respondent and Respondent's Designation of Matter to be Included on the Record of Appeal on Defendants and Appellant above-named by depositing a copy of it in the United States Mail, postage prepaid, on June 1, 2016 addressed to their attorneys of record:

Samuel R. Clawson, Esquire  
Christy R. Fagnoli, Esquire  
Clawson and Staubes, LLC  
126 Seven Farms Drive, Suite 200  
Charleston, SC 29492


Mark B. Tinsley, Esquire  
Gooding & Gooding, PA  
P.O. Box 1000  
Allendale, SC 29810

Shannon Jones, Esquire  
Shannon Jones Law, LLC  
3 State St.  
Charleston, SC 29401



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David B. Yarborough, Jr.  
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*Attorneys for Respondent*

, 2016



**YARBOROUGH  
APPLEGATE**  
ATTORNEYS AT LAW

Lydia Blessing Applegate  
lydia@yarboroughapplegate.com

June 1, 2016

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

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**SC Court of Appeals**

Re: Ex Parte: Nationwide Mutual Fire Insurance  
In Re: Anna Angelacci  
Appellate Case No. 2016-000063  
Our File No. 14-062

Dear Ms. Kitchings:

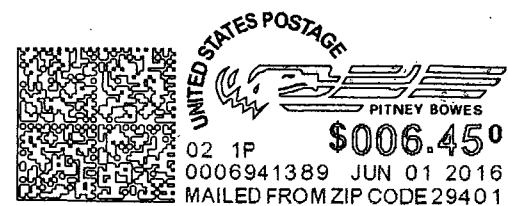
Enclosed please find the original and one (1) copy of Respondent's Initial Brief, Proof of Service, and Designation of Matter to be Included in Appeal in the above-referenced matter. Please file the original and return a date-stamped copy of each in the enclosed envelope. Please do not hesitate to contact me with any questions or concerns.

Sincerely yours,

Lydia Blessing Applegate

Enclosures as stated

cc: Samuel R. Clawson, Esquire  
Christy R. Fagnoli, Esquire  
Shannon Jones, Esquire  
Mark B. Tinsley, Esquire



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APPLGATE**  
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