

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Robert E. Hood, Circuit Court Judge
Jocelyn Newman, Circuit Court Judge

Appellate Case No.: 2016-000986

RECEIVED
SEP 07 2016
SC Court of Appeals

Porthemos Curry.....Respondent/Appellant,

v.

Carolina Insurance Group of SC, Inc. and Maurice
Derrick.....Appellants/Respondents.

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

Respondent/Appellant proposes the following to be included in the consolidated
Record on Appeal:

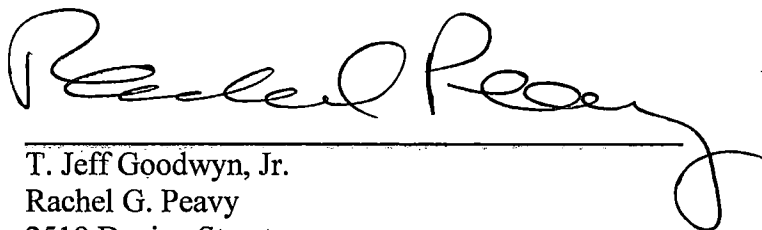
1. Order of Judge Newman dated June 23, 2016.
2. Order of Judge Hood dated May 9, 2016.
3. Complaint.
4. Answer of Agency.
5. Amended Complaint.
6. Answer of Agency to Amended Complaint.
7. Amended Complaint filed October 1, 2015 (second amended complaint)

8. Answer of Agency to second Amended Complaint.
9. Amended Answer of Agency to Second Amended Complaint dated 4/19/16.
10. Answer of Scottsdale to second Amended Complaint.
11. Agency's Motion for Summary Judgment.
12. Agency's Amended Motion for Summary Judgment.
13. Agency's Amended Memo in Support of Motion for Summary Judgment.
14. Customer's Cross-Motion for Summary Judgment.
15. Customer's Memorandum in Support of Cross-Motion for Summary Judgment (filed April 19, 2016).
16. Customer's Amended Memorandum in Opposition to and Support of Cross-Motion for Summary Judgment (Redacted) (filed April 26, 2016)
17. J. Newman Transcript of Record of April 18-19, 2016, pp. 30-101.
18. J. Hood Transcript of Record from April 26, 2016, pp. 1-51.
19. Policy of Insurance, Tab 2, April 26, 2016 Hearing documents.
20. Scottsdale Release
21. Stipulation of Dismissal as to Scottsdale Insurance Company.
22. Affidavit of P. Curry.
23. Affidavit of R. Peavy.
24. Affidavit of T. Jeff Goodwyn.
25. Deposition of Porthemos Curry (Vol. 1) pp. 4-5, 12-13, p.53.
26. Deposition of Porthemos Curry (Vol. 2) pp. 4-5, 19.
27. Deposition of Mitchell, p. 35:5-36:5.

28. Letter of Wesley Peel to the Hon. Alison R. Lee (12/8/15)
29. Letter of Hannah Stetson to Wesley Peel
30. Letter of J.R. Murphy
31. Agency's Motion for Sanctions (Withdrawn 4/26/16)
32. Memorandum in Opposition to Motion for Sanctions
33. Defendant's Request for Production (Sept. 2014)
34. Deposition of Maurice Derrick (pp.90-91)
35. 30(b)(6) Deposition of Carolina Insurance Group (pp.26-27; 76-77)
36. E-mail to Judge Lee (4/11/16)

Pursuant to Rule 209(c), SCACR, I certify that this Designation contains no matter which is irrelevant to the appeal.

GOODWYN LAW FIRM, LLC



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September 7th, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Appellate Case No.: 2016-0006986

Porthemos Curry,.....Respondent/Appellant,

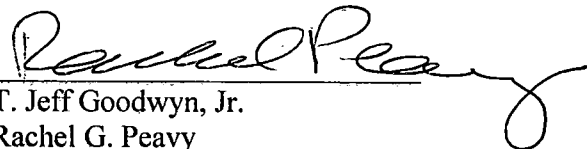
v.

Carolina Insurance Group of SC, Inc. and Maurice
Derrick.....Appellants/Respondents.

PROOF OF SERVICE

I certify that I have served the **Respondent/Appellant's Initial Brief** along with **Respondent/Appellant's Designation of Matter to be Included in the Record on Appeal** on Wesley D. Peel, Esquire and Bryan M. J. Triplett, Esquire, Attorneys for the Appellants/Respondents, at the address listed below by depositing a copy of same in the United States Mail, postage prepaid, on September 7, 2016.

Wesley D. Peel, Esquire
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Bruner Powell Wall & Mullins, LLC
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RECEIVED
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SC Court of Appeals

September 7, 2016

VIA HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

RE: *Porthemos Curry v. Carolina Insurance Group of SC, Inc. and Maurice Derrick*
Appellate Case No.: 2016-000986
Our File No.: 3000-0106

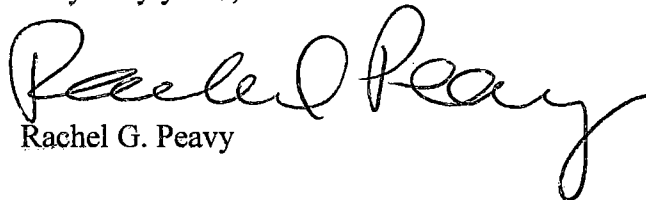
Dear Ms. Kitchings:

Please find enclosed for filing the original and one copy of the **Initial Brief of Respondent/Appellant and Designation of Matter to Be Included in the Record on Appeal**, along with the Proof of Service, in regard to the above-referenced matter.

By copy of this letter and as evidenced by the attached Proof of Service, I am serving a copy of the Initial Brief of Respondent/Appellant and Designation of Matter upon Wesley D. Peel, Esquire, and Bryan M. J. Triplett, Esquire, attorneys for the Appellants/Respondents.

Please accept my highest regards.

Very truly yours,



Rachel G. Peavy

RGP/msb
Enclosures

cc: Wesley D. Peel, Esquire (w/encl.) (via US Mail)
Bryan M. J. Triplett, Esquire (w/encl.) (via US Mail)
Porthemos Curry (w/encl.) (via US Mail)