

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2014-CP-16-0792
Appellate Case No. 2016-000840

RECEIVED

DEC 19 2016

SC Court of Appeals

State Farm Mutual Automobile
Insurance Company Respondent,

Beverly Goyeneche, David R. Gray, III and
Amanda Goyeneche (a/k/a Amanda Goyeneche-Gray),
Individually and as Parent and Natural Guardian of S.G., Defendants

Of whom
Beverly Goyeneche and Amanda Goyeneche are
Appellants

DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL

Appellants propose the following be included in the Record on Appeal:

1. Order of June 1, 2015;
2. Order of March 23, 2016;
3. Complaint;
4. Answer by Appellants;
5. Reply to Appellants' Answer;
6. Brief in Support of Plaintiff's Complaint with attachments, dated April 6, 2015:
 - a. Stipulation of Facts dated April 2, 2015
 - b. State Farm Policy 9840a
 - c. Deposition Transcript of David R. Gray, III
 - d. Deposition Transcript of Amanda Goyeneche
 - e. Deposition Transcript of Beverly Goyeneche;

7. Appellants' Memorandum of Law dated April 7, 2015;
8. Reply Brief in Support of Complaint dated April 14, 2015;
9. Defendants' Proposed Order dated April 21, 2015
10. Appellants' Motion to alter or Amend the Judgment dated June 15, 2015;
11. Correspondence from Respondent to court regarding Rule 59 motion, dated July 6, 2015;
12. Correspondence from Appellants to court regarding Rule 59 motion, dated July 8, 2015;
13. Respondent's Brief in Opposition to Motion to Amend dated December 15, 2015;
14. Transcript of hearing April 7, 2015;
15. Transcript of hearing December 15, 2015;
16. Plaintiff's Request for Admissions to Defendant David R. Gray, III dated February 6, 2015;
17. Defendant Grays's Reply to Plaintiff's Request for Admissions dated March 6, 2015.

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

DuBOSE-ROBINSON, PC

BY: 

Jonathan M. Robinson, S.C. Bar No. 68285
P.O. Drawer 39 (935 Broad St.)
Camden, SC 29021-0039
(803) 254.5445 – telephone
(803) 254.5007 – facsimile

ATTORNEYS FOR RESPONDENT

Columbia, SC
December 19, 2016

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court of Common Pleas

Paul M. Burch, Circuit Court Judge

Case No. 2014-CP-16-0792
Appellate Case No. 2016-000840

RECEIVED

DEC 19 2016

SC Court of Appeals

State Farm Mutual Automobile
Insurance Company Respondent,

Beverly Goyeneche, David R. Gray, III and
Amanda Goyeneche (a/k/a Amanda Goyeneche-Gray),
Individually and as Parent and Natural Guardian of S.G., Defendants


Of whom
Beverly Goyeneche and Amanda Goyeneche are Appellants

PROOF OF SERVICE

The undersigned hereby certified that on the date indicated below she served counsel with a copy of the Initial Brief of Respondent and Designation of Matter to Be Included in The Record On Appeal by mailing copies of the same by United States Postal Service with first class postage prepaid to the following address:

John S. Nichols, Esquire, Bar No. 4210
BLUESTEIN, NICHOLS, THOMPSON & DELGADO, LLC
Post Office Box 7965
Columbia, South Carolina 29202

Karl H. Smith, Esquire, Bar No. 5272
SMITH WATTS & ASSOCIATES, LLC
508 South Fourth Street
Hartsville, South Carolina 29550


Selena C. Coggins, Paralegal

Columbia, South Carolina
December 19, 2016

DuBose-Robinson, PC

ATTORNEYS AT LAW
935 Broad Street
Camden, South Carolina 29020
Telephone: 803-432-1992
Fax: 803-432-0784

J. Kennedy DuBose, Jr.
Jonathan M. Robinson
John K. DuBose, III
H. Thomas Morgan, Jr.
L. Shawn Sullivan

REPLY TO: Mailing Address
PO Drawer 39
Camden, SC 29021

Columbia Office
2725 Devine St.
Columbia, SC 29205
Telephone: 803-254-5445

December 19, 2016

VIA HAND DELIVERY

The Honorable Jenny Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RECEIVED

DEC 19 2016

SC Court of Appeals

RE: *State Farm Mutual Automobile Insurance Company v. Beverly Goyeneche, David R. Gray, III and Amanda Goyeneche (a/k/a Amanda Goyeneche-Gray), individually and as Parent and Natural Guardian of Sophia Goyeneche-Gray Case Tracking No.: 2016-000840*

Dear Ms. Kitchings:

Please find enclosed herewith for filing the original and one (1) copy of the Initial Brief of Respondent and Designation of Matter to Be Included in The Record on Appeal in regards to the above-referenced case. Also enclosed is a Proof of Service upon counsel for Appellants. Please return the filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Very truly yours,

DuBOSE-ROBINSON, PC


Jonathan M. Robinson

JMR/scc
Enclosures

cc: John S. Nichols, Esquire
Karl H. Smith, Esquire