

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM ANDERSON COUNTY  
COURT OF COMMON PLEAS

The Honorable J. Cordell Maddox, Jr., Circuit Court Judge

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Case Number 2016-000867

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Daryhl Taylor as Personal Representative  
of the Estate of Ruth T. Simpson.....Respondent,

v.

Johnson & Johnson Preferred Financing, ProCentury Insurance Company, FINCO Premium  
Finance Co., Inc. and Carolina Independent Automobile Dealers Association, Dealers Risk  
and Insurance Services, Independent Dealers Insurance  
Management.....Defendants,

Of Whom ProCentury Insurance Company is the .....Respondent.

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DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL


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Pursuant to Rule 209, SCACR, the Respondent, Daryhl Taylor, designates the following material additional to that identified by the Appellant to be included in the Record on Appeal

1. Account Notes for Autos Nex Store as provided by Defendant Johnson and Johnson Preferred Financing;
2. Correspondence from FINCO to Independent Dealers Insurance Management, dated July 28, 2011;
3. Notice History for Autos Nex Store as provided by Defendant Johnson & Johnson Preferred Financing;

4. FINCO Cancelled Check to Autos Nex Store, dated August 17, 2011

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



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Steven M. Krause (S.C. Bar No. 3571)  
Timothy A. Nowacki (S.C. Bar No. 100967)  
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207 E. Calhoun Street  
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Attorney for the Respondent

December 21, 2016

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of the Estate of Ruth T. Simpson ..... Respondent,

v.

Johnson & Johnson Preferred Financing, ProCentury Insurance Company, FINCO  
Premium Finance Co., Inc. and Carolina Independent Automobile Dealers Association,  
Dealers Risk and Insurance Services, Independent Dealers Insurance  
Management ..... Defendants,

Of Whom ProCentury Insurance Company is the ..... Appellant.

PROOF OF SERVICE

I certify that I served copies of Respondent's Initial Brief and the Designation of  
Matter to be Included in the Record on Appeal by United States Mail, postage  
prepaid, addressed to:

Mr. Phillip E. Reeves  
Mr. Nicholas A. Farr  
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3231 Sunset Boulevard, Suite A  
West Columbia, South Carolina 29169

**KRAUSE, MOORHEAD & DRAISEN, P.A.**



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December 21, 2016.



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**SC Court of Appeals**

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

RE: Darhyl Taylor, as personal representative of the Estate of Ruth T. Simpson v. Johnson & Johnson Preferred Financing, ProCentury Insurance company, FINCO Premium Finance Co., Inc. and Carolina Independent Automobile Dealers Association, Dealers Risk and Insurance Services, Independent Dealers Insurance Management – Case No.: 2016-000867

Dear Ms. Kitchings:

Enclosed please find the originals and three copies of Respondent’s Initial Brief, Designation of Matter to be Included in the Record on Appeal and my Proof of Service for same in the above-referenced matter.

Please file the originals and return the clocked copies in the enclosed envelope.

With kind regards,

**KRAUSE, MOORHEAD & DRAISEN, P.A.**

Timothy A. Nowacki

TAN/dh  
Enclosure

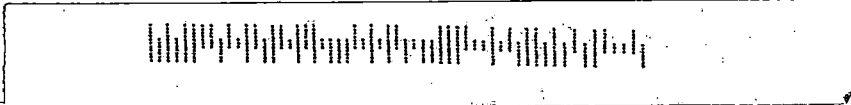
- cc: Phillip E. Reeves, Esq.
- Nicholas A. Farr, Esq.
- Stephen L. Brown, Esq.
- Thomas L. Stephenson, Esq.
- William E. Booth, III, Esq.



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The South Carolina Court of Appeals  
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