

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

RECEIVED

CASE NO. 2016-CP-26-798

MAY 12 2017

SC Court of Appeals

South Carolina Farm Bureau Mutual Insurance Company Respondent

vs.

Michael David Harrelson, Devora Harrelson, Kevin Duke
and Government Employees Insurance Company Defendants

OF WHOM:

Michael David Harrelson and Devora Harrelson are Appellants
and

Government Employees Insurance Company is Respondent

AMENDED NOTICE OF APPEAL

The Defendants, Michael David Harrelson and Devora Harrelson previously appealed the February 27, 2017 Form 4 Orders¹ of The Honorable Benjamin H. Culbertson granting summary judgment to Plaintiff South Carolina Farm Bureau Mutual Insurance Company and granting summary judgment to Defendant Government Employees Insurance Company.

The Defendants, Michael David Harrelson and Devora Harrelson, appeal the Order Granting Defendant Government Employees Insurance Company's Motion for Summary Judgment dated March 17, 2017. A filed copy of the signed Order was received March 17, 2017.

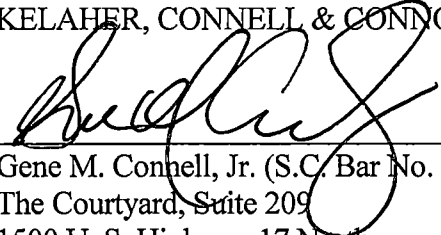
¹ A protective Notice of Appeal was filed on March 24, 2017 based on the Form 4 Orders.

The Defendants, Michael David Harrelson and Devora Harrelson, appeal the Order Granting Plaintiff's Motion for Summary Judgment dated March 27, 2017. A filed copy of the signed Order was received March 28, 2017.

The Defendants, Michael David Harrelson and Devora Harrelson, further appeal the subsequent Order Denying Motions for Reconsideration dated May 3, 2017. This Order was received on May 4, 2017.

Further, counsel had filed a Motion to Stay with this Court which is moot in light of the decision of the trial court denying reconsideration on May 3, 2017.

KELAHER, CONNELL & CONNOR, P.C.



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Attorney for Appellants Michael David
Harrelson and Devora Harrelson

May 10, 2017
Surfside Beach, South Carolina.

Other Counsel of Record:

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Attorney for Kevin Duke

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and

Government Employees Insurance Company is..... Respondent

PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of Kelaher, Connell & Connor, P.C., and that she has served a copy of the **Amended Notice of Appeal** on the Respondents, on the 11th day of May, 2017, by depositing a copy of same in the United States Mail, postage prepaid, to:

J. Dwight Hudson, Esquire
Hudson & Graham Law Offices
P. O. Box 70218
Myrtle Beach, SC 29572

John E. Rogers, II, Esquire
The Ward Law Firm, P.A.
P. O. Box 5663
Spartanburg, SC 29304

William H. Monckton, VI, Esquire
Monckton, Hembree & Humphries, PA
1300 Professional Drive, Suite 102
Myrtle Beach, SC 29577

Shelia Y. McCumbee
Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 11th day of May, 2017.

Donna H. Hand
Notary Public for South Carolina
My Commission Expires: 3-28-26

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
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LISA POE DAVIS

* OF COUNSEL

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238-5648
FAX: 238-5050

May 10, 2017

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

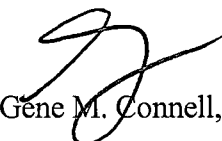
Re: Appellate Case No. 2017-000745
South Carolina Farm Bureau Mutual Insurance Company v. Michael David Harrelson, Devora Harrelson, Kevin Duke and Government Employees Ins. Co.
C/A No. 2016-CP-26-798
Our File No. 2015-0183C

Dear Ms. Kitchings:

I write you this letter in regard to the above-captioned matter. I previously filed a Motion to Stay since I had not yet received the trial court's Order on reconsideration. I just received such Order on May 4, 2017. The Motion to Stay is moot and is no longer necessary in light of the trial court's Order. I have filed an Amended Notice of Appeal based on my conversation with the Clerk's Office to add the trial court's Order Denying Reconsideration. Please clarify in writing if anything else is necessary. My calculations are that the Initial Brief and Designation of Matter would be due June 3, 2017. If this is not correct, please contact me.

With best regards, I am

Sincerely yours,


Gene M. Connell, Jr.

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SC Court of Appeals

GMC,Jr.:sm

cc : J. Dwight Hudson, Esquire
John E. Rogers, II, Esquire
William H. Monckton, VI, Esquire

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW
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SC Court of Appeals

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

Re: *South Carolina Farm Bureau Mutual Insurance Company v. Michael David Harrelson, Devora Harrelson, Kevin Duke and Government Employees Ins. Co.*
C/A No. 2016-CP-26-798
Our File No. 2015-0183C

Dear Ms. Kitchings:

Enclosed for filing is an Amended Notice of Appeal in the above-captioned case along with Proof of Service. I also enclose copies of the Orders to be challenged on Appeal.

Please return a clocked copy to us in the self-addressed, stamped envelope provided.

By copy of this letter, I hereby serve the Respondents, through counsel of record, with the Amended Notice of Appeal.

Thank you for your kind assistance in this matter.

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm
Enclosures
cc w/enc:

J. Dwight Hudson, Esquire
John E. Rogers, II, Esquire
William H. Monckton, VI, Esquire

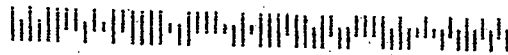


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SC Court of Appeals



Kelaker, Connell & Connor, PC

1500 US HIGHWAY 17 NORTH, SUITE 209

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SURFSIDE BEACH, SC 29587

To

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