

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas

RECEIVED

The Honorable Benjamin H. Culbertson, Circuit Court Judge

JUN 30 2017

SC Court of Appeals

CASE NO. 2016-CP-26-798

South Carolina Farm Bureau Mutual Insurance Company Plaintiff

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

South Carolina Farm Bureau Mutual Insurance Company is Respondent
and

Government Employees Insurance Company is Respondent

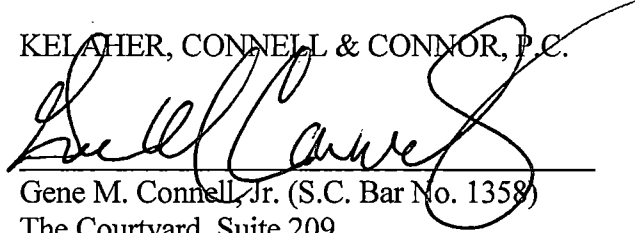
**DESIGNATION OF MATTER TO BE
INCLUDED IN RECORD ON APPEAL**

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

1. Order Denying Motions for Reconsideration dated May 3, 2017
2. Order Granting Plaintiff's (South Carolina Farm Bureau Mutual Insurance Company) Motion for Summary Judgment dated March 27, 2017
3. Order Granting Defendant Government Employees Insurance Company's Motion for Summary Judgment dated March 17, 2017
4. Form 4 Order dated February 27, 2017 Granting Defendant Government Employees Insurance Company's Motion for Summary Judgment
5. Form 4 Order dated February 27, 2017 Granting Plaintiff's (South Carolina Farm Bureau Mutual Insurance Company) Motion for Summary Judgment
6. Transcript of Hearing February 27, 2017

7. Motion for Reconsideration of Order Granting Defendant Government Employees Insurance Company's Motion for Summary Judgment filed March 27, 2017
8. Motion for Reconsideration of Order Granting Plaintiff's (South Carolina Farm Bureau Mutual Insurance Company) Motion for Summary Judgment filed April 5, 2017
9. Memorandum of Law in Response to Motions for Summary Judgment of South Carolina Farm Bureau and Government Employees Insurance Company February 24, 2017
10. Motion for Summary Judgment filed by Defendant Government Employees Insurance Company December 7, 2016
11. Motion for Summary Judgment filed by Plaintiff South Carolina Farm Bureau Mutual Insurance Company December 2, 2016
12. Complaint (*Government Employees Insurance Co. v. Duke, et al.*; C/A No. 2016-CP-26-424) filed January 21, 2016
13. Answer and Counterclaim of Harrelson (*Government Employees Ins. Co. v. Duke, et al.*; C/A No. 2016-CP-26-424) filed February 11, 2016
14. Reply to Counterclaim (*Government Employees Ins. Co. v. Duke, et al.*; C/A No. 2016-CP-26-424) dated February 17, 2016
15. Complaint (*South Carolina Farm Bureau Mutual Ins. Co. v. Harrelson, et al.*; C/A No. 2016-CP-26-798) filed February 4, 2016
16. Answer of Harrelson (*South Carolina Farm Bureau Mutual Ins. Co. v. Harrelson, et al.*; C/A No. 2016-CP-26-798) filed March 23, 2016
17. Deposition of Michael Harrelson November 29, 2016
18. Deposition of Devora Harrelson November 29, 2016
19. Deposition of Kevin Duke November 29, 2016

KELAHER, CONNELL & CONNOR, P.C.



Gene M. Connell, Jr. (S.C. Bar No. 1358)
The Courtyard, Suite 209
1500 U. S. Highway 17 North
Post Office Drawer 14547
Surfside Beach, South Carolina 29587-4547
(843) 238-5648 (phone)
(843) 238-5050 (facsimile)
gconnell@classactlaw.net
Attorney for Appellants Michael David
Harrelson and Devora Harrelson

June 28, 2017
Surfside Beach, South Carolina.

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vs.

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and Government Employees Insurance Company Defendants

OF WHOM:

Michael David Harrelson and Devora Harrelson are..... Appellants
and

South Carolina Farm Bureau Mutual Insurance Company is..... Respondent
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 **Appellants' Designation of Matter** on the Respondents on the 28th day of June, 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 28th day of June, 2017.

Marie P. Freeman
Notary Public for South Carolina
My Commission Expires: 6/11/24

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.
L. SIDNEY CONNOR, IV
LISA POE DAVIS

* OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

June 28, 2017

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SC Court of Appeals

The Honorable Jenny Abbott 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:

Enclosed please find the following for filing in the above-captioned matter:

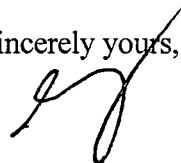
- (1) Original and one copy of Initial Brief of Appellants, with Proof of Service;
- (2) Original and one copy of Appellant's Designation of Matter to be Included in Record on Appeal, with Proof of Service;

We also enclose a self-addressed, stamped envelope for return of a filed copy of each to this office.

By copy of this letter, we hereby serve copies of these documents on Respondents through counsel of record.

With best regards, I am

Sincerely yours,



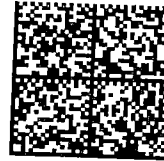
Gene M. Connell, Jr.


GMC,Jr.:sm

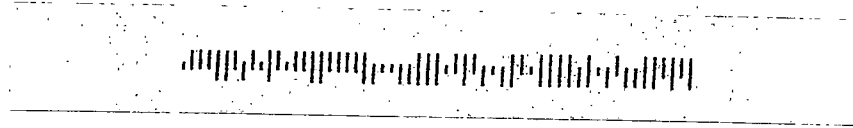
Enclosures

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

<p><i>Kelahr, Connell & Connor, PC</i> 1500 US HIGHWAY 17 NORTH, SUITE 209 POST OFFICE DRAWER 14547 SURFSIDE BEACH, SC 29587</p>	
<p>To</p>	<p>The Honorable Jenny Abbott Kitchings Clerk, South Carolina Court of Appeals Post Office Box 11629 Columbia, South Carolina 29211</p>