

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM Horry County  
Court of Common Pleas

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The Hon. Benjamin H. Culbertson, Circuit Court Judge

AUG 29 2017

SC Court of Appeals

Case No: 2016-CP-26-798

Appellate Case No: 2017-000745

South Carolina Farm Bureau Mutual Insurance Company..... Respondent

v.

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

Of Whom, Michael David Harrelson and  
Devora Harrelson are ..... Appellants

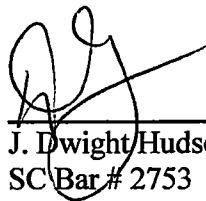
And  
Government Employees Insurance Company is ..... Respondent

**INITIAL DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL BY  
RESPONDENT SOUTH CAROLINA FARM BUREAU**

Respondent South Carolina Farm Bureau Mutual Insurance Company (Hereinafter,  
"SCFB") proposes the following be included in the Record on Appeal:

1. SCFB's Complaint with all exhibits/attachments re SCFB v. Harrelson, et al)
2. All Answers/Replies to the SCFB Complaint;

3. SCFB's Motion for Summary Judgment
4. SCFB's Full & Complete Memorandum Supporting its Motion For Summary Judgment including all exhibits and the SCFB policy
5. Transcript of the Summary Judgment Hearing
6. The Court's Form 4 Order(s)
7. Order Granting Summary Judgment to SCFB;
8. Appellants' Motion(s) for Reconsideration;
9. Order Denying Motion(s) For Reconsideration;
10. Deposition Transcripts:
  - A. Devora Harrelson
  - B. Michael David Harrelson
  - C. Kevin Dukes
11. The Full and Complete Walmart Video and Timeline



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J. Dwight Hudson, Esquire  
SC Bar # 2753  
**Hudson & Graham**  
PO Box 70218  
Myrtle Beach, SC 29572  
(843) 692-9889

***Attorney For: Respondent South  
Carolina Farm Bureau Mutual  
Insurance Company***

Date:

THE STATE OF SOUTH CAROLINA  
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APPEAL FROM HORRY COUNTY  
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And  
Government Employees Insurance Company is ..... Respondent

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**RULE 209(C) CERTIFICATION**

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Pursuant to Rule 209(c) SCACR, the undersigned certifies that the Designation of Matter to be Included In The Record on Appeal contains no matter which is irrelevant to the appeal.



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J. Dwight Hudson, Esquire  
SC Bar # 2753

**Hudson & Graham**  
PO Box 70218  
Myrtle Beach, SC 29572  
(843) 692-9889

*Attorney For: Respondent South  
Carolina Farm Bureau Mutual  
Insurance Company*

Date:

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM Horry COUNTY  
Court of Common Pleas

The Hon. Paul M. Burch, Circuit Court Judge

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South Carolina Farm Bureau Mutual Insurance Company... Respondent

v.

Michael David Harrelson, Devora Harrelson, Kevin Duke, and  
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Of Whom, Michael David Harrelson and  
Devora Harrelson are Appellants

And  
Government Employees Insurance Company is Respondent

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**PROOF OF SERVICE**

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I certify that I have served Respondent South Carolina Farm Bureau's **Initial Brief & Designation Of Matter To Be Included In The Record On Appeal** on the 28th of August, 2017 by depositing a copy of it in the United States Mail, postage prepaid, to:

Gene M. Connell, Esquire  
**Kelaher, Connell & Connor**  
PO Box 14547  
Surfside, SC 29587

John E. Rogers II  
The Ward Law Firm, P.A.  
233 South Pine Street  
Spartanburg, SC 29302

William Monckton  
Monckton, Hembree, Mureddu & Humphries  
1300 Professional Drive, Suite 102  
Myrtle Beach, SC 29577



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(843) 692-9889

***Attorney For: Respondent South  
Carolina Farm Bureau Mutual  
Insurance Company***

Dated: August 26, 2017

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Reply To:  
PO Box 70218  
Myrtle Beach, SC 29572

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AUG 29 2017

SC Court of Appeals

August 28, 2017

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

Re: South Carolina Farm Bureau Mutual Insurance Company v. Michael David Harrelson,  
Devora Harrelson, Kevin Duke and Government Employees Insurance Company,  
*Appellate Case No: 2017-000745*

Dear Ms. Kitchings:

Enclosed for filing are an original and a copy of the following on behalf of Respondent South Carolina Farm Bureau Mutual Insurance Company:

- Initial Brief
- Designation of Matter to Be Included In the Record On Appeal
- Rule 209(c) Certification for Designation
- Proof of Service of the Initial Brief & Designation

Please return a clocked copy to me via the enclosed stamped, self-addressed, return envelope.

If more is needed, I ask that you please advise.

Thanking the Court for its consideration, and with best regards, I remain

*J. Dwight Hudson, Esq.*  
J. Dwight Hudson, Esq.

JDH: mag  
Enclosure(s): as stated  
cc: Counsel of Record

**P**

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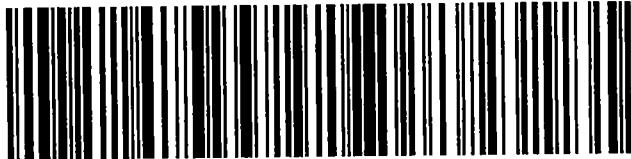
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SHIP  
TO:

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
PO Box 11629  
Columbia SC 29211-1629



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