

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals  
Appellate Case No. 2017-002234

**RECEIVED**  
FEB 21 2018  
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Case No. 2016-CP-40-5885  
Jocelyn Newman, Circuit Court Judge

Stephany A. Connelly and James M. Connelly.....Plaintiffs

v.

The Main Street America Group, Old Dominion Insurance Company,  
Allstate Fire and Casualty Insurance Company, Debbie Cohn,  
and Freya Trezona.....Defendants

Of whom Allstate Fire and Casualty Insurance Company,  
The Main Street America Group and Old Dominion Insurance  
Company.....Appellants

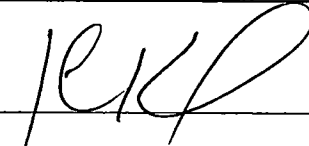
and

Of whom Stephany A. Connelly and James M. Connelly.....Respondents

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**RESPONDENTS STEPHANY A. CONNELLY AND JAMES M. CONNELLY  
DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD ON  
APPEAL**

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John D. Kassel, Esquire  
Theile McVey, Esquire  
Kassel McVey Law Firm  
1330 Laurel Street  
Columbia, SC 29201  
803-256-4242

Attorney for Respondents Stephany  
A. Connelly and James M. Connelly

Pursuant to Rule 209, SCACR, Respondents, Stephany A. Connelly and James M. Connelly, designates the following material to be included in the Record on Appeal:

**Pleadings**

1. Complaint
2. Answer of Allstate
3. Answer of Main Street/Old Dominion
4. Stipulation of Facts

**Motions And Memoranda**

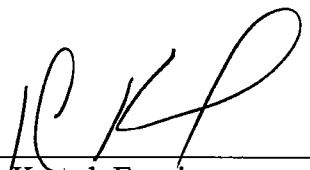
5. Main Street/Old Dominion's Motion for Summary Judgment
6. Main Street/Old Dominion's Memorandum in Support of Motion for Summary Judgment
7. Allstate's Motion for Summary Judgment
8. Allstate's Memorandum in Support of Motion for Summary Judgment
9. Plaintiff's Motion for Summary Judgment
10. Plaintiff's Memorandum in Support of Motion for Summary Judgment
11. Main Street/Old Dominion's Adoption of Allstate's Memorandum in Opposition to Plaintiff's Motion for Summary Judgment
12. Allstate's Memorandum in Opposition to Plaintiff's Motion for Summary Judgment
13. Allstate's Supplemental Memorandum in Support of Motion for Summary Judgment

**Orders**

14. Order Granting Plaintiffs' Motion for Summary Judgment and Denying Defendants' Motion for Summary Judgment signed by The Honorable Jocelyn Newman on September 28, 2017 and filed on October 2, 2017

**Other**

15. Allstate Policy
16. Main Street/Old Dominion Policy



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John D. Kassel, Esquire  
Theile B. McVey, Esquire  
Kassel McVey, Attorneys at Law  
P.O. Box 1476  
Columbia, South Carolina 29202  
803-256-4242  
803-256-1952 (Facsimile)

Attorney for Respondents Stephany  
A. Connelly and James M. Connelly

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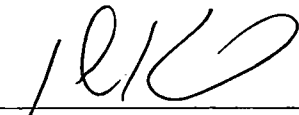
and

Stephany A. Connelly and James M. Connelly.....Respondents

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**RESPONDENTS STEPHANY A. CONNELLY AND JAMES M. CONNELLY  
CERTIFICATION AS TO DESIGNATION OF MATTER**

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\_\_\_\_\_  
John D. Kassel, Esquire  
Theile McVey, Esquire  
Kassel McVey Law Firm  
1330 Laurel Street  
Columbia, SC 29201  
803-779-1833

Attorney for Respondents Stephany  
A. Connelly and James M. Connelly

Counsel for Stephany A. Connelly and James M. Connelly, hereby certifies that the Designation of Mater submitted on February 16, 2018 contains no matter which is irrelevant to the appeal.



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John D. Kassel, Esquire  
Theile B. McVey, Esquire  
Kassel McVey, Attorneys at Law  
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Columbia, South Carolina 29202  
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Attorney for Respondents Stephany  
A. Connelly and James M. Connelly

February 14, 2018

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Of whom Allstate Fire and Casualty Insurance Company,  
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and

Of whom Stephany A. Connelly and James M. Connelly.....Respondents

**PROOF OF SERVICE**

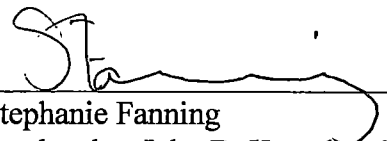
I, the undersigned employee of Kassel McVey Law Firm, do hereby certify that I have caused the below referenced to be served via U.S. mail, postage prepaid, or by other delivery as indicated, to all parties of record at the address(es) shown below.

1. Stephany A. Connelly and James M. Connelly’s Initial Brief;
2. Stephany A. Connelly and James M. Connelly’s Designation of Matter to be Included in the Record on Appeal;
3. Stephany A. Connelly and James M. Connelly’s Certification as to Designation of Matter; and
4. Proof of Service.

A. Johnston Cox, Esquire  
Ashley B. Stratton, Esquire  
Gallivan, White, & Boyd, P.A.  
Post office Box 7368  
Columbia, SC 29202

Benjamin D. McCoy, Esquire  
Howser, Newman & Besley, LLC  
PO Box 12009  
Columbia, SC 29211

Law Office of Thomas Dougall  
Thomas F. Dougall, Esquire  
Michal Kalwajtys, Esquire  
1700 Woodcreek Farms Road, Suite 100  
Elgin, SC 29045

A handwritten signature in black ink, appearing to read 'Stephanie Fanning', written over a horizontal line.

Stephanie Fanning  
Paralegal to John D. Kassel and  
Theile B. McVey

February 16, 2018

# KASSEL McVEY

JOHN D. KASSEL  
ATTORNEY AT LAW  
JKASSEL@KASSELLAW.COM

February 16, 2018

THEILE B. McVEY  
ATTORNEY AT LAW  
TMCVEY@KASSELLAW.COM

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, SC 29201

Re: *Stephany Connelly and James M. Connelly v. The Main Street America Group; Old Dominion Insurance Company; Allstate Fire and Casualty Insurance Company; Debbie Cohn; and Freya Trozona*  
Richland County Case No. 2016-CP-40-5885  
Court of Appeal Case No. 2017-002234  
Allstate Claim No. 0396105223  
GWB File No. 8300-345

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Dear Ms. Kitchings:

Enclosed for filing with your office are the following:

1. Stephany A. Connelly and James M. Connelly's Initial Brief;
2. Stephany A. Connelly and James M. Connelly's Designation of Matter to be Included in the Record on Appeal;
3. Stephany A. Connelly and James M. Connelly's Certification as to Designation of Matter; and
4. Proof of Service.

I would appreciate you filing the original and returning a clocked copy to me in the envelope enclosed.

Yours very truly,



Stephanie Fanning  
Paralegal to John D. Kassel and Theile B. McVey

SLF:bmh  
Enclosures

cc: A. Johnston Cox, Esquire  
Ashley B. Stratton, Esquire  
Benjamine D. McCoy, Esquire  
Thomas F. Dougall, Esquire  
Michal Kalwajtys, Esquire

JOHN D. KASSEL, ATTORNEY AT LAW, LLC

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**KASSEL MCVEY ATTORNEYS AT LAW**

Post Office Box 1476  
Columbia, South Carolina 29202-1476

**The Honorable Jenny Abbott Kitchings**  
**South Carolina Court of Appeals**  
**1015 Sumter Street**  
**Columbia, SC 29201**

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