

IN THE STATE OF SOUTH CAROLINA

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In the Court of Appeals

APR 13 2018

SC Court of Appeals

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

The Honorable Alison Renee Lee, Circuit Court Judge

Appellate Case No. 2017-001946  
Trial Court Case No. 2015-CP-18-01571

Progressive Direct Insurance Co., and  
USAA General Indemnity Company, ..... Respondents,

v.

Shanna Groves as the Personal Representative of the  
Estate of Lynn Harrison.....Appellant.

**RESPONDENTS' DESIGNATION OF MATTER TO BE INCLUDED IN THE RECORD  
ON APPEAL**

Respondents Progressive Direct Insurance Company and USAA General Indemnity  
Company propose the following to be included in the Record on Appeal in addition to the items  
designated by Appellant:

1. Order of August 17, 2017;
2. Complaint;
3. Amended Complaint;
4. Answer on Behalf of James Mark Harrison as the Personal Representative of the Estate  
of Lynn Harrison;
5. Plaintiffs' Motion for Summary Judgment;

6. Plaintiffs' Memorandum in Support of Motion for Summary Judgment (with all exhibits); and
7. Plaintiffs' Amended Responses to Defendant's Requests to Admit.

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

Respectfully submitted,



Wesley B. Sawyer, Esquire

S.C. Bar No. 100229

Murphy & Grantland, P.A.

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Attorney for Respondents

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v.

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**CERTIFICATE**

I, Wesley B. Sawyer, Esquire, attorney for Respondent, certify that the Respondents' Brief and Designation of Matter comply with the South Carolina Supreme Court Order of August 13, 2007 and Rule 211(b) of the South Carolina Court Rules.



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April 13, 2018

**HAND DELIVERED**

Jenny A. Kitchings  
South Carolina Court of Appeals  
1205 Pendleton St.  
P.O. Box 11629  
Columbia, SC 29211

Re: Progressive Direct Insurance Co., and USAA General Indemnity Company vs. James Mark Harrison as the Personal Representative of the Estate of Lynn Harrison  
Civil Action No.: 2015-CP-18-1571  
Claim No.: 155621943 (Progressive) 31913153-5 (USAA)  
Date of Loss: 4-2-15  
Our File No.: 1115-2637/3250-0892

Dear Ms. Kitchings:

Enclosed please find herewith for filing with the Court the original and five (5) copies of the Initial Brief of Respondents and Respondents' Designation of Matter to Be Included in the Record on Appeal in the above-referenced matter. I would appreciate your filing the original and returning the clocked copies to me by individual delivering same. By copy of this letter I am serving same on opposing counsel.

With warm personal regards, I am

Sincerely yours,

Wesley B. Sawyer

WSB/rlb  
Enclosures

cc: Ryan H. Sigal, Esquire  
John P. Linton, Jr., Esquire

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