

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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JUN 08 2018

S.C. SUPREME COURT

APPEAL FROM ABBEVILLE COUNTY
Court of Common Pleas

The Honorable Eugene C. Griffith, Jr., Circuit Court Judge

Case No. 2012-CP-01-00306
Appellate Case No. 2016-001512

Richard Wilson, Michael J. Antoniak, Jr., Marsha L. Antoniak, Anita L. Belton, Prescott
Darren Bosler, Johnny Calhoun, Sallie Calhoun, Cynthia Gary, Robert Wayne Gary,
Eugene P. Lawton, Jr., Jeanette Norman, James Robert Shirley, Robert W. Spires, Crystal
Spires Wiley, Lewis S. Williams, Janie Wiltshire, Benjamin Franklin Wofford, Jr., and
Rebecca Hammond Wofford,..... ~~Defendants~~ Petitioners,

v.

Laura B. Willis and Jesse A. Dantice, individually, and as agents and/or brokers for
Southern Risk Insurance Services LLC, Travelers Casualty Insurance Company of
America, Allied Property and Casualty Insurance Co., Peerless Insurance Co.,
Montgomery Mutual Insurance Co., Safeco Insurance Co. of America, and Foremost
Insurance Co., Southern Risk Insurance Services, LLC, Travelers Casualty Insurance Co.
of America, Allied Property and Casualty Insurance Co., Peerless Insurance Co.,
Montgomery Mutual Insurance Co., Safeco Insurance Co. of America, and Foremost
Insurance Co., and Laurie Williams,..... Defendants,

Of whom Peerless Insurance Co., Montgomery Mutual Insurance
Co., and Safeco Insurance Co. of America are..... ~~Defendants~~ Respondents,

and

Of whom Laurie Williams is aPetitioner.

PETITIONER LAURIE WILLIAMS' REPLY TO BRIEF OF RESPONDENTS

HAWTHORNE MERRILL LAW, ATTORNEY FOR PETITIONER LAURIE WILLIAMS
Jane H. Merrill
410 Main Street | Greenwood, SC 29646
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Petitioner Williams adopts and incorporates the arguments presented in the Reply Brief of Petitioners filed by Attorneys Thomas E. Hite, Jr., Anne Marie Hempy, and Leslie A. Bailey pursuant to Rule 208(b)(6), SCACR. This adoption includes the law and documents to which Petitioners cite.

CONCLUSION

The Court of Appeals erred in holding Ms. Williams' rights stemmed from the Agency Agreement instead of her rights stemming from her status as an insured and a potential beneficiary of an insurance policy. The Court of Appeals also erred in holding the Insurers did not waive their right to compel arbitration. This Court should reverse the decision of the Court of Appeals, and affirm the trial court's denial of the Insurers' Motion to Compel Arbitration.

Respectfully Submitted,

HAWTHORNE MERRILL LAW, LLC



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June 8, 2018

Greenwood, South Carolina

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Rebecca Hammond Wofford,..... [REDACTED] Petitioners,

v.

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Montgomery Mutual Insurance Co., Safeco Insurance Co. of America, and Foremost
Insurance Co., Southern Risk Insurance Services, LLC, Travelers Casualty Insurance Co.
of America, Allied Property and Casualty Insurance Co., Peerless Insurance Co.,
Montgomery Mutual Insurance Co., Safeco Insurance Co. of America, and Foremost
Insurance Co., and Laurie Williams,.....Defendants,

Of whom Peerless Insurance Co., Montgomery Mutual Insurance
Co., and Safeco Insurance Co. of America are..... [REDACTED] Respondents,

and

Of whom Laurie Williams is aPetitioner.

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify I have served all counsel of record with a copy of the pleading(s) listed below by mailing same by United States Mail, postage prepaid, to the following:

Pleadings:

Petitioner Laurie Williams' Reply To Brief of Respondents
Certificate of Service

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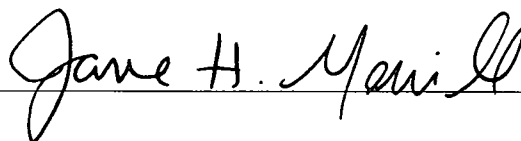
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(Signature page follows.)

Respectfully Submitted,
HAWTHORNE MERRILL LAW, LLC

A handwritten signature in cursive script that reads "Jane H. Merrill". The signature is written in black ink and is positioned above a horizontal line.

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June 7, 2018
Greenwood, South Carolina