

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

Larry B. Hyman, Circuit Court Judge

Case No. 2016-CP-26-4464

RECEIVED
JUN 29 2018
SC Court of Appeals

Jill Keck Humphries, Dennis L. Johnson, Jr., Delona Penny Rice, Whitmel L. Brown, Jr., Gary
Steven Robinson, Elizabeth Erin Humphries, and Nancy H. JohnsonPlaintiffs,

v.

Tilghman Beach and Racquet Club Condominium Association, Inc., James H. Austin, III, Daniel
G. Coe, C. Doug Madison, George P. White and Steele Brice Windle, III, individually and as
Members of the Board of Directors of the Tilghman Beach and Racquet Club Condominium
Association, Inc. Respondents,

v.

Great American Insurance CompanyAppellant.

**RETURN IN OPPOSITION TO APPELLANT’S EMERGENCY MOTION FOR A
PROTECTIVE ORDER**


Plaintiffs, Jill Keck Humphries, Dennis L. Johnson, Jr., Delona Penny Rice, Whitmel L.
Brown, Jr., Gary Steven Robinson, Elizabeth Erin Humphries, and Nancy H. Johnson, submit
this return in opposition to the emergency motion for a protective order filed by Great American
Insurance Company (“Great American”).

For the reasons set forth in Defendants' / Respondents' Return in Opposition to Appellant's Emergency Motion for a Protective Order previously filed with the Court, Plaintiffs respectfully request that Great American's motion be denied.

Great American should not be allowed to hold this entire case—especially Plaintiffs' claims—hostage while it appeals an order of the trial court on only one of Defendants / Third-Party Plaintiff's causes of action that is not even dispositive of Defendant / Third-Party Plaintiffs' entire case against Great American. Further, based upon a previous order of the trial court, the trial of Plaintiffs' claims will be separate from any trial of the Defendant / Third-Party Plaintiff's claims against Great American. There is simply no reason discovery cannot continue on the Plaintiffs' and Defendant / Third-Party Plaintiffs' claims during the pendency of Great American's appeal on a single cause of action in the Third-Party Complaint.

Respectfully submitted,

**BELLAMY, RUTENBERG, COPELAND
EPPS, GRAVELY & BOWERS, P.A.**

By: 
Howell V. Bellamy, III, S. C. Bar No. 66575
hbellamyiii@bellamylaw.com
Howell V. Bellamy, Jr., S.C. Bar No. 68543
nrichardson@bellamylaw.com
1000 29th Ave. N.
Myrtle Beach, S. C. 29577
843-448-2400 Phone
843-448-3022 Facsimile
Attorneys for Plaintiffs

June 29, 2018