

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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CERTIFIED QUESTION FROM THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

J. Michelle Childs, United States District Judge

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Appellate Case No. 2016-001351

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Sentry Select Insurance Company,

v.

Maybank Law Firm, LLC and Roy P. Maybank,

**RECEIVED**

OCT 01 2018

S.C. SUPREME COURT

Plaintiff,

Defendants,

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PLAINTIFF'S REPLY TO DEFENDANTS' RESPONSE  
TO SUPPLEMENTAL BRIEF ON  
CERTIFIED QUESTIONS

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**LAW OFFICE OF DARYL G. HAWKINS, LLC**

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*Attorney for Plaintiff Sentry Select Insurance  
Company*

**PLAINTIFF'S REPLY TO DEFENDANTS' RESPONSE TO  
SUPPLEMENTAL BRIEF ON CERTIFIED QUESTIONS**


The central issue before the Court is whether or not the Defendants should be held responsible for their failure to follow the South Carolina Rules of Civil Procedure which caused almost \$1,000,000 in damages.

What is perceived but non-existent by the Defendants is the notion that if they are held responsible for their negligence the attorney-client relationship between insurance defense counsel and their insureds will be forever injured. Despite most of the states adopting one or more theories of recovery by insurance carriers in similar or analogous circumstances, the defendants cannot cite a single court opinion, law review article, legal treatise, or other evidence where such an injury has ever been observed.

This Court should provide for a cause of action for Sentry to recover against the Defendants for Sentry's losses proximately caused by Defendants' failure to follow the South Carolina Rules of Civil Procedure.

Respectfully submitted,

**LAW OFFICE OF DARYL G. HAWKINS, LLC**

By:   
Daryl G. Hawkins (SC Bar # 02844)

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October 1, 2018

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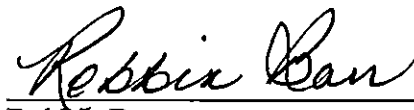
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PROOF OF SERVICE

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I, the undersigned, with the Law Office of Daryl G. Hawkins, LLC, do hereby certify that I have this date caused a copy of *Plaintiff's Reply to Defendant's Response to Supplemental Brief* to be served on counsel of record in the above-referenced matter, by placing a copy in the United States Mail, postage prepaid and return address clearly indicated, as follows:

David W. Overstreet, Esquire  
Michael McCall, Esquire  
David Kropski, Esquire  
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October 1, 2018