

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM THE CHARLESTON COUNTY COURT OF COMMON PLEAS

Jennifer B. McCoy, Circuit Court Judge

---

Appellate Case No. 2018-001353

---

Bouchelle Incorporated,

Appellant,

v.

Canopus US Insurance, Inc.,  
Seneca Specialty Ins. Co.,  
the Brinson Agency and  
John Brinson, of whom

**The Brinson Agency and  
John Brinson** are the,

Respondents.

**RECEIVED**  
OCT 18 2018  
SC Court of Appeals

---

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

---

The Respondents identify the following items to be included in the Record on Appeal pursuant to Rule 209, SCACR:

1. Complaint (filed Sep. 20, 2016);
2. Answer of John Brinson and the Brinson Agency (collectively "Brinson") (Apr. 11, 2017);
3. Brinson's Motion for Summary Judgment (Sep. 6, 2017);
4. Brinson's Brief in Support of Sep. 6, 2017, Motion for Summary Judgment (Dec. 8, 2017);
5. Transcript of Deposition of David Bouchelle (Nov. 29, 2017) (including all exhibits);
6. Order denying Brinson's 9/6/17 Motion for Summary Judgment (Dec. 14, 2017);

7. Transcript of deposition of Andrew Fowles as corporate representative of Canopius US Insurance, Inc. ("Canopius") (Jan. 8, 2018);
8. Order granting Defendant Seneca Specialty Insurance Co.'s ("Seneca") Motion for Judgment on the Pleadings (Jan. 9, 2018);
9. Transcript of Deposition of John S. Brinson (Jan. 12, 2018) (including all exhibits);
10. Brinson's Motion for Summary Judgment (Feb. 14, 2018) (including exhibits);
11. Order granting Defendant Canopius' Motion for Summary Judgment (Mar. 19, 2018);
12. Bouchelle Incorporated's ("Bouchelle") Brief in Opposition to Brinson's Motion for Summary Judgment (May 21, 2018);
13. Transcript of hearing for Motion for Summary Judgment (Jun. 18, 2018); and
14. Order granting Defendants the Brinson Agency and John Brinson's Motion for Summary Judgment (Jun. 29, 2018).

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

October 16, 2018



---

COUNTRYMAN LAW FIRM

Andrew W. Countryman

State Bar No.: 72700

321 Wingo Way, Ste. 102

Mt. Pleasant, SC 29464

843-253-4477

[awc@countrymanlawfirm.com](mailto:awc@countrymanlawfirm.com)

**Lawyer for Respondents**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM CHARLESTON COUNTY COURT OF COMMON PLEAS

Jennifer B. McCoy, Circuit Court Judge

---

Appellate Case No. 2018-001353

---

Bouchelle Incorporated,

Appellant,

v.

Canopus US Insurance, Inc.,  
Seneca Specialty Ins. Co.,  
the Brinson Agency and  
John Brinson, of whom

**The Brinson Agency and  
John Brinson** are the,

Respondents.

**RECEIVED**  
OCT 18 2018  
SC Court of Appeals

---

**PROOF OF SERVICE**

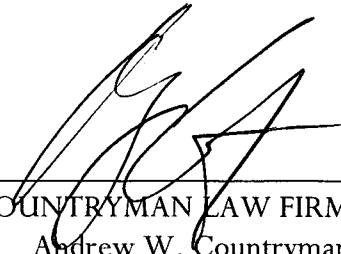
---

I certify that I have served the Respondents' Initial Brief and Rule 209, SCACR Designation of Matter to be included in the Record on Appeal on Appellant by depositing a copy in the United States Mail, postage prepaid addressed as follows:

Karen M. DeJong  
222 West Coleman Blvd., Ste. 110  
Mt. Pleasant, SC 29464-5652

[signature page to follow]

This 16<sup>th</sup> day of October, 2018



---

COUNTRYMAN LAW FIRM

Andrew W. Countryman

321 Wingo Way, Ste. 102

Mt. Pleasant, SC 29464

843-253-4477

[awc@countrymanlawfirm.com](mailto:awc@countrymanlawfirm.com)

**Lawyer for Respondents**

# COUNTRYMAN LAW FIRM

LITIGATION ♦ MEDIATION

Andrew W. Countryman  
321 Wingo Way, Suite 102  
Mount Pleasant, S.C. 29464  
\*Certified S.C. Circuit Court Mediator

awc@countrymanlawfirm.com  
www.countrymanlawfirm.com  
843.253.4477 office  
844.644.3165 fax

October 16, 2018

South Carolina Court of Appeals  
Jenny Abbott Kitchings, Clerk  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**  
OCT 18 2018  
SC Court of Appeals

Re: *Bouchelle v. Brinson, et al.*  
Appellate Case No.: 2018-001353  
CLF: 00008 – 00012

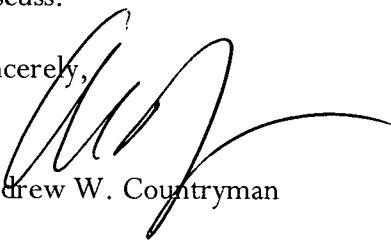
Dear Jenny:

I represent the Respondents, John Brinson and the Brinson Agency, in this case. I enclose the following for filing on behalf of the Respondents:

- (a) Initial Brief;
- (b) Rule 209, SCACR Designation of Matter to be Included in the Record on Appeal and
- (c) Proof of Service.

By copy of this letter, I serve Appellant's counsel with the same. Thanks for your assistance, and please let me know if you have any questions or need to discuss.

Sincerely,

  
Andrew W. Countryman

AWC/sgc

Enclosures

cc via U.S. mail (w/enclosures): Karen DeJong

1

US POSTAGE & FEES PAID  
6 OZ FIRST-CLASS MAIL FLATS RATE

062S0010037519  
FROM 29464

RETAIL



stamps  
endicia  
10/15/2018

**USPS FIRST CLASS MAIL®**

Andrew Countryman  
Countryman Law Firm  
321 Wingo Way, Suite 102  
Mount Pleasant SC 29464

**B012**

**SHIP TO:** South Carolina Court of Appeals  
Jenny Abbott Kitchings, Clerk  
P.O. Box 11629  
Columbia SC 29211-1629



**RECEIVED**  
OCT 18 2018  
SC Court of Appeals