

IN THE STATE OF SOUTH CAROLINA

In the Court of Appeals

Case No. 2018-001134

Glenda R. Couram .....

Appellant

v.

Nationwide Mutual Insurance Company, Titan Indemnity Company, Eugene Matthews, in his individual capacity, Sherwood's Plumbing Services, LLC dba and Beatrice Tyree Tidwell, Rick Skurko in his official and individual capacity and Tracey Peer, in her official and individual capacity ..... Respondents

**RECEIVED**  
JAN 31 2019  
SC Court of Appeals


**RESPONDENTS  
NATIONWIDE MUTUAL INSURANCE COMPANY'S, TITAN  
INDEMNITY COMPANY'S, RICK SKURKO'S AND TRACEY PEER'S  
MOTION TO STRIKE THE RECORD ON APPEAL**

Respondents Nationwide Mutual Insurance Company, Titan Indemnity Company, Rick Skurko, and Tracey Peer, by and through their undersigned attorney, move this Court to strike the Record on Appeal for the following reasons.

1. The Record on Appeal appears to contain Appellant's personal copies of the lower court filings, complete with her handwritten notes regarding the arguments presented by counsel and her perception of the timeline of the case. None of these handwritten notes were Designated by any party for inclusion in the Record on Appeal.
2. The Record on Appeal does not contain all matter designated by the parties for inclusion in the record on appeal. Particularly, the Record on Appeal does not contain the following designated matter:
  - a. Respondent Matthews' Answer and Exhibits of July 14, 2017.

- b. Nationwide Mutual Ins. Co. and Titan Indemnity Co.’s Amended Motion to Dismiss of August 28, 2017.
  - c. Appellant’s Response to Amended Motion to Dismiss of September 1, 2017.
  - d. Order Denying Motion to Reconsider of May 16, 2018. (As to this matter, Appellant included an unsigned version of this order, rather than the signed and issued order.)
  - e. Final Decision of the State Employee Grievance Committee of September 25, 2018.
3. The Record on Appeal is not organized or arranged in the manner prescribed by South Carolina Appellate Court Rules 210(c).

“The Record on Appeal shall include all matter designated to be included by any party...The Record shall not, however, include matter which was not presented to the lower court or tribunal.” SCACR 210(c). The Record on Appeal contains matter not presented to the lower court, does not include matter designated by the parties for inclusion in the Record on Appeal, and does not conform to the requirements of SCACR 210. Therefore, Respondents respectfully request this Court strike the Record on Appeal and order Appellant to submit a new Record on Appeal containing all designated matters and complying with SCACR 210.



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(803) 782-4100  
Attorney for Respondents,  
Nationwide Mutual Insurance  
Company, Titan Indemnity

Company, Rick Skurko in his official  
and individual capacity and Tracey  
Peer, in her official and individual  
capacity

January 31, 2019.

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Glenda R. Couram .....

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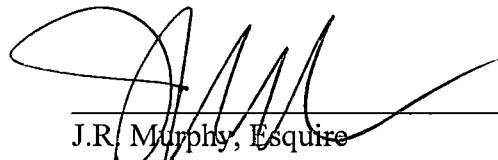
**PROOF OF SERVICE**

I certify that I have served the Respondents Nationwide Mutual Insurance Company's, Titan Indemnity Company's, Rick Skurko's and Tracey Peer's Motion to Strike the Record on Appeal by depositing a copy of it in the United States Mail, postage prepaid, on January 31, 2019, addressed to:

Glenda R. Couram  
104 Macaw Lane  
Lexington, SC 29073

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January 31, 2019

**HAND DELIVERED**

Jenny A. Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street (1220 Senate Street)  
P.O. Box 11629  
Columbia, SC 29211

Re: Glenda R. Couram vs. Nationwide Mutual Insurance Company, Titan Indemnity Company, Eugene Matthews, in his individual capacity, Sherwood's Plumbing Services, LLC dba and Beatrice Tyree Tidwell, Rick Skurko in his official and individual capacity and Tracey Peer, in her official and individual capacity

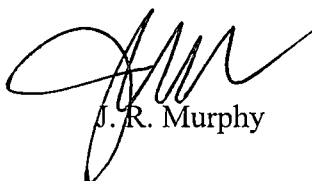
Civil Action No.: 2017-CP-40-04048  
Appellate Case No.: 2018-001134  
Claim No.: 576642-GF-01-01-0011134313  
Date of Loss: 09-18-15  
Our File No.: 1150-0950

Dear Ms. Kitchings:

Enclosed please find herewith for filing with the Court the original and ten (10) copies of Respondents Nationwide Mutual Insurance Company's, Titan Indemnity Company's, Rick Skurko's and Tracey Peer's Motion to Strike the Record on Appeal in the above-referenced matter. I would appreciate your filing the original and returning three (3) clocked copies to me by individual delivering same. Also enclosed please find my firm's check in the amount of \$50.00 for the appropriate filing fee. Please return a receipt for same by individual delivering same.

By copy of this letter I am serving same on opposing counsel. With warm personal regards, I am

Sincerely yours,

  
J. R. Murphy

JRM/sb  
Enclosures

cc: Glenda R. Couram  
E. Dale Lang, Jr., Esquire  
Eugene H. Matthew, Esquire  
Linda Butler (via email)  
Jason C. Hunter, Esquire (via email)

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