

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge

Case No. 2019-000009

**RECEIVED**  
APR 29 2019  
SC Court of Appeals

Tyrin S. Young, Sr., Individually,  
as PR of the Estates of Tyrin Young, Jr.  
and Micah A. Young and as Legal  
Guardian of J.Y., a minor under the age of 14.....Appellant,

v.

USAA General Indemnity Company.....Respondent.

DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL

Appellant proposes the following be included in the Record on Appeal:

**ORDERS:**

1. Order Granting USAA’s Motion for Summary Judgment and Dismissing Cross-Motions Related to Discovery Disputes as Being Moot filed October 8, 2018
2. Order Denying Plaintiff’s Motion to Reconsider filed December 6, 2018

**PLEADINGS**

3. Complaint filed July 26, 2017
4. Answer and Counterclaim filed on October 6, 2017  
Ex. The California Auto Policy
5. Reply to Counterclaim filed on November 3, 2017

## **MOTIONS, SUPPORTING MEMORANDA AND OTHER FILINGS**

6. Defendant's Motion for Summary Judgment filed on July 25, 2018
7. Defendant's Memorandum in Support of Motion for Summary Judgment filed on September 19, 2018
  - a. Exhibit A – USAA – South Carolina Policy
  - b. Exhibit B – USAA – California Policy
8. Plaintiff's Memorandum in Opposition to Defendant USAA General Indemnity Company's Motion for Summary Judgment September 19, 2018
  - a. Exhibit A – Excerpt of Depositions of Tyrin Young and Kamika Young
  - b. Exhibit B – the Youngs SC Driver's Licenses
  - c. Exhibit C – the Youngs' 2015 Federal and SC State Tax Return
  - d. Exhibit D – 2006 KIA Title History Detail
  - e. Exhibit E – Tax Receipt for the KIA – 2015 and 2016
  - f. Exhibit F – Copies of Tyrin Young's Guam Orders and Shipping Docs.
  - g. Exhibit G – Premium Renewal Letters – January 3, 2015 and July 3, 2015
  - h. Exhibit H – Certificates of Appointment for the deceased children
9. Defendant's Motion for Protective Order filed on July 25, 2018
  - a. Exhibit - Notice of Rule 30(b)(6) Deposition of Defendant USAA General Indemnity Company
10. Plaintiff's Motion to Compel Attendance at Rule 30(b)(6) Deposition filed on September 5, 2018
  - a. Exhibit - Notice of Rule 30(b)(6) Deposition of Defendant USAA General Indemnity Company
11. Plaintiff's Memorandum in Support of its Motion to Compel Attendance at Rule 30(b)(6) Deposition and in Opposition to Defendant USAA General Indemnity Company's Motion for Protective Order filed on September 19, 2018
12. Plaintiff's Motion to Reconsider filed on October 17, 2018
  - a. Exhibit -- Letter from Judge Gravely dated October 1, 2018

## **TRANSCRIPTS**

13. Transcript of hearing held on September 24, 2018

**DEPOSITIONS**

14. Deposition of Tyrin Young June 29, 2018
15. Deposition of Kamika Young June 29, 2018

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

Respectfully Submitted,



Richard K. Allen, III S.C. Bar No. 74865  
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ATTORNEYS FOR APPELLANT

April 26, 2019

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM GREENVILLE COUNTY  
COURT OF COMMON PLEAS

PERRY H. GRAVELY, CIRCUIT COURT JUDGE

C.A. No.: 2019-000009

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Guardian of J.Y. minor under the age of 14. .... Appellant,

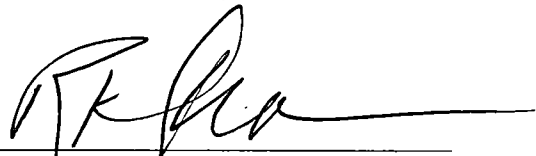
v.

USAA General Indemnity Company ..... Respondents.

**PROOF OF SERVICE**

I certify that I have served the **Initial Brief of Appellant** and **Designation of Matter to be Included in the Record son Appeal** on USAA General Indemnity Company by depositing a copy of it in United States mail on April 26, 2019, addressed to its attorney of record, Patrick "Trey" Still, III, Clawson & Staubes, LLC, 1000 E. North St., Ste. 200, Greenville, SC 29601.

**GUEST & BRADY, LLC**



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**Guest & Brady**<sup>LLC</sup>  
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April 26, 2019

**VIA UNITED PARCEL SERVICE OVER NIGHT**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**RECEIVED**  
APR 29 2019  
SC Court of Appeals

**RE: Tyrin Young, Sr., et al vs. USAA General Indemnity Company**  
**C.A. No.: 2019-000009**

Dear Ms. Kitchings:

Please find enclosed herewith one (1) copy of the following documents: **Initial Brief of Appellant** and **Designation of Matter to be Included in the Record of Appeal** in connection with the above referenced matter along with the **Certificate of Service** for service of same.

Please contact me if you have any questions.

With kindest regards, I remain

Sincerely,



Richard K. Allen, III

RKA/sjc

Enclosures

cc: Patrick "Trey" Still, Esq. (regular mail - w/enclosures)  
Clawson and Staubes  
1000 E. North St, Ste 200  
Greenville, SC 29601  
*Attorney for USAA General Indemnity Company*

4/26/2019

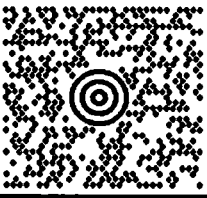
GUEST & BRADY, LLC  
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**SHIP TO:**

THE HONORABLE JENNY A. KITCHINGS  
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**COLUMBIA SC 29201-3769**



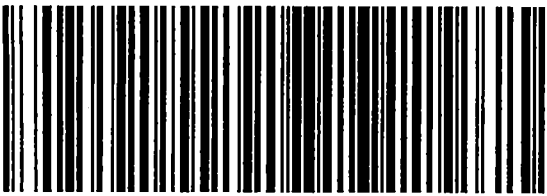
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