

**Reply To**

HELEN F. HISER  
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helen.hiser@mgclaw.com

June 10, 2019

**Via U.S. Mail**

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

**RECEIVED**  
JUN 12 2019  
SC Court of Appeals

RE: Richard L. Winslow and Charmayne Winslow v. Matthew W. Hudson and Waste Pro USA, Inc., and Waste Pro of South Carolina, Inc., and Liberty Mutual Fire Insurance Co., and Liberty Mutual Insurance Group, Inc.  
Civil Action Nos.: Civil Action No. 2017-CP-27-115 and Civil Action No. 2018-CP-27-00442  
Date of Incident: November 4, 2015  
Carrier Claim No.: AB505-382519-01  
MGC File No.: 2095.17210  
Appeal No. 2018-001955

Dear Ms. Kitchings:

We are writing in response to this Court's letter dated May 31, 2019 and the non-dispositional Order issued on February 7, 2019. At present, there have been no developments at the Circuit Court in either Civil Action No. 2017-CP-27-115 or Civil Action No. 2018-CP-27-00442 pending in the Jasper County Court of Common Pleas. Waste Pro is refiling its Motion to Dismiss Pursuant to Rule 12(b)(8), or Alternatively, Motion to Consolidate in Docket No. Civil Action No. 2018-CP-27-00442. In addition, Waste Pro is writing letters to the Jasper County Clerk of Court in both dockets advising of this Court's February 7, 2019 Order and seeking resolution of the pending motions.

We will provide another update 30 days from today's date. If you have any questions, please do not hesitate to contact me.

Sincerely,  
McAngus Goudelock & Courie, LLC



Helen F. Hiser

cc: Patrick W. Carr, Esquire  
David S. Cobb, Esquire  
Kathleen C. Barnes, Esq.

bcc: Douglas Sleezer, Liberty Mutual Insurance

**mgc**

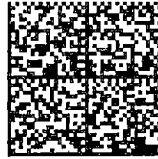
**INSURANCE  
DEFENSE**

CHARLESTON

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**2095.17210/ HFH/mtb**

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