

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

Case No.: 2017-CP-32-00507

RECEIVED
JUL 25 2019
SC Court of Appeals

LM Insurance Corporation, Plaintiff,

v.

Josh Steele, Defendant, Third-Party Plaintiff, Appellant,

v.

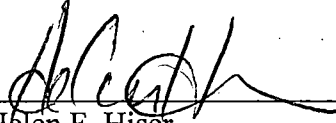
Ernie Yarborough d/b/a Yarborough
Insurance Agency, Third-Party Defendant Respondent.

**REPLY TO RETURN TO
MOTION TO DISMISS APPEAL**

Respondent Ernie Yarborough d/b/a Yarborough Insurance Agency hereby replies to Appellant Josh Steele's Return to Motion to Dismiss Appeal. To the extent that the undersigned inadvertently missed the prior service of the Notice of Appeal on the Circuit Court, Respondent withdraws its Motion to Dismiss the pending appeal. However, the undersigned also has confirmed and advises the Court that no one filed the Notice of Appeal with the Lexington County Circuit Court on July 2, 2019 on behalf of Respondent Yarborough. In fact, the on-line service confirmation shows that it was filed by or on behalf of a Mona Huggins. (Exh. A). It is unclear what relationship, if any, Mona Huggins has with any of the parties to this appeal. We presumed Appellant had filed the Notice which prompted our Motion.

McANGUS GOUDELOCK & COURIE, LLC

July 23, 2019



Helen F. Hiser

S.C. Bar No.: 76124

735 Johnnie Dodds Blvd., Suite 200 (29464)

P.O. Box 650007

Mount Pleasant, South Carolina 29465

(843) 576-2900

*Attorneys for Respondent Ernie Yarborough d/b/a
Yarborough Insurance Agency*

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

A filing has been submitted to the court RE: 2017CP3200507

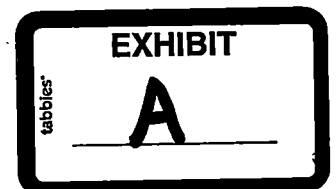
Official File Stamp: 07-01-2019 01:34:30 PM
Court: CIRCUIT COURT
Common Pleas
Lexington
Case Caption: LM Insurance Corporation VS Josh Steele ,
defendant, et al
Document(s) Submitted: Appeal/Notice of Appeal to Court of Appeals
Appeal/Notice of Appeal to Court of Appeals
Filed by or on behalf of: Mona Huggins

This notice was automatically generated by the Court's auto-notification system.

The following people were served electronically:

Albert John Dooley, Jr.
John Carroll Moylan, III
Elizabeth McDaniel McMillan for Ernie
Yarborough, Ernie Yarborough
Morgan S. Templeton for LM Insurance
Corporation
Robert Daniel Dodson for Josh Steele
Amanda Mange Scott for LM Insurance
Corporation

The following people have not been served electronically by the Court. Therefore, they must be served by traditional means:



Certificate of Electronic Notification

Recipients

Elizabeth McMillan - Notification transmitted on 07-01-2019 01:34:43 PM.

Morgan Templeton - Notification transmitted on 07-01-2019 01:34:43 PM.

John Moylan - Notification transmitted on 07-01-2019 01:34:43 PM.

Robert Dodson - Notification transmitted on 07-01-2019 01:34:43 PM.

Amanda Scott - Notification transmitted on 07-01-2019 01:34:43 PM.

Albert Dooley - Notification transmitted on 07-01-2019 01:34:43 PM.

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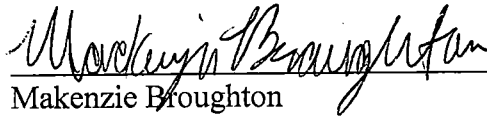
Josh Steele, Defendant, Third-Party Plaintiff,Appellant,
v.

Ernie Yarborough d/b/a Yarborough
Insurance Agency, Third-Party DefendantRespondent.

PROOF OF SERVICE

I certify that I have served the Respondent's **Reply to Return to Motion to Dismiss Appeal** on Josh Steele, by depositing a copy of it in the United States Mail, postage prepaid, on July 23, 2019, addressed to his attorney of record:

Robert D. Dodson, Esquire
LAW OFFICES OF ROBERT DODSON, P.A.
1722 Main Street, Ste. 200
Columbia, South Carolina 20201


Makenzie Broughton
Legal Assistant to Helen F. Hiser
McANGUS GOUDELICK & COURIE LLC
735 Johnnie Dodds Blvd., Suite 200
PO Box 650007
Mount Pleasant, South Carolina 29465
(843) 576-2900

Attorneys for Respondent

Reply To

HELEN F. HISER
Direct Dial: (843) 576-2930
helen.hiser@mgclaw.com

July 23, 2019

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JUL 25 2019

SC Court of Appeals

Via U.S. Mail

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: LM Insurance Corporation vs. Josh Steele vs. Ernie Yarborough d/b/a
Yarborough Insurance Agency
Civil Action No.: 2017-CP-32-00507 (Lexington)
Carrier Claim No.: N/A
MGC File No.: 20595.17033
Appeal No.: 2017-002220

Dear Ms. Kitchings:

Enclosed please find the original and seven (7) copies of Respondents' Reply to Return to Motion to Dismiss Appeal, and the original and one copy of the Proof of Service in the above-referenced matter. Please file the originals and return a clocked-in copy in the enclosed self-addressed, stamped envelope.

If you have any questions, please do not hesitate to contact me.

Yours truly,

McAngus Goudelock & Courie, LLC



Helen F. Hiser

Enclosures

cc: Robert D. Dodson, Esq.



mgc | INSURANCE
DEFENSE

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JUL 25 2019
SC Court of Appeals

20595.17033/HFH/mtb
The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
P. O. Box 11629
Columbia, South Carolina 29211

