

STATE OF SOUTH CAROLINA)
)
 COUNTY OF SUMTER)
)
 State Farm Mutual Automobile Insurance)
 Company as subrogee of)
 Persephone Clark-Anderson,)
)
)
)
 Plaintiffs,)
)
 vs.)
)
 Dinnero L. McKnight,)
)
)
 Defendant.)

RECORDED
 IN THE COURT OF COMMON PLEAS
 2015 OCT 20 PM 2:57
 CASE NO.: 2015-CP-43-1676
 JAMES C. CAMPBELL
 CLERK OF COURT
 SUMTER COUNTY, S.C.

**MOTION FOR DEFAULT JUDGMENT
 AND DAMAGES HEARING**

Plaintiff above-named, through its undersigned attorneys, move before the presiding administrative judge for the 3rd Judicial Circuit, Sumter County, South Carolina, for judgment by default against the Defendant Dinnero L. McKnight, for the relief demanded in the Complaint.

This motion is made pursuant to Rule 55 of the SCRPC and on the grounds that an Affidavit of Default/Entry for default has been properly entered upon the calendar by the Clerk as to the Defendant. (See Exhibit 1). As of the time of this filing, no one has appeared for the Defendant named in this action. Further, the attached affidavit/verification (See Exhibit 2) provides proper documentation supporting a sum certain amount of \$22,098.30. See SCRPC Rule 55(b)(1) (“Cases Involving Liquidated Damages or Sum Certain Amounts). When the claim of a party seeking judgment by default is for a liquidated amount or a sum certain amount or a sum which can by computation be made certain, the judge, upon motion or application of the party seeking default, and upon affidavit/verification of the amount due, shall enter judgment for that amount and costs against the party against whom judgment by default is sought, if that party has been placed in default for failure to appear and if such party is not a minor or incompetent person, a verified pleading may be used in lieu of an affidavit when the pleading contains information sufficient to determine or compute the sum certain.

Based upon the materials attached hereto coupled with the legal authority referenced herein, Plaintiff requests judgment by default for \$22,098.30, plus costs against the Defendant Dinnero L. McKnight.

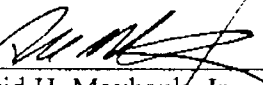
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OCT 14 2019

AUTO-3289-SC

SC Court of Appeals

Maybank & Owings, LLC

By: 
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Attorneys for the Plaintiff
File No.: AUTO-3289-SC

Charleston, South Carolina

Dated: September 14 2015

CERTIFICATE OF MAILING

I hereby certify that a copy of the foregoing pleading
was mailed to the defendant in this proceeding at the last known address

This 14 day of September, 2015



Sara Robinson
Paralegal to David H. Maybank, Jr.