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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM DARLINGTON COUNTY
Court Of Common Pleas

The Honorable Paul M. Burch, Judicial Circuit Court Judge
Trial Court Case No.: 2015CP1600815

RECEIVED
OCT 23 2019
SC Court of Appeals

Appellate Case No. 2018-001108

Allstate Fire and Casualty Insurance Company Respondent,

v.

Pamela Goodwin.Appellant.

MOTION TO CONSOLIDATE

Respondent Allstate Fire and Casualty Insurance Company (“Allstate”) files this motion pursuant to South Carolina Appellate Court Rules 214 and 240 seeking an order from this Honorable Court consolidating this matter with Appellate Case No. 2018-001675 captioned *Allstate Property and Casualty Insurance Company v. Natoshia Hamilton and Kenneth Collins Coogler*. In support of this motion, Allstate states as follows:

1. Rule 214, SCACR provides that “[w]here there is more than one appeal from the same order, judgment, decision or decree, or where the same question is involved in two or more appeals in different cases, the appellate court may, in its discretion, order the appeal to be consolidated.”

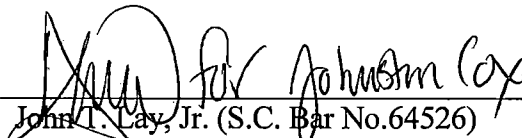
2. Both Appellate Case No. 2018-001108 and Appellate Case No. 2018-001675 involve the same question, whether Allstate's acceptance of the material terms of the settlement demands through performance of the material terms created a valid and enforceable settlement agreement.

3. Because both of these cases involve the same question, it is proper that they be consolidated, and the Court's rules permits such consolidation.

WHEREFORE, for the reasons stated here and upon good cause shown, Allstate respectfully requests that this matter be consolidated with Appellate Case No. 2018-001675

October __, 2019

By:



John T. Lay, Jr. (S.C. Bar No. 64526)

A. Johnston Cox (S.C. Bar No. 09081)

Janice Holmes (S.C. Bar No. 75038)

GALLIVAN, WHITE & BOYD, P.A.

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Columbia, South Carolina 29202

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ATTORNEYS FOR RESPONDENT

ALLSTATE FIRE & CASUALTY INSURANCE
COMPANY

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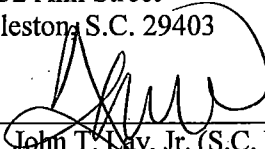
PROOF OF SERVICE

I certify that I served copies of the Motion to Consolidate by United States mail, postage prepaid, addressed to:

Eric M. Poulin, Esq., Roy T. Willey, IV, Esq., and Lane D. Jefferies, Esq.
Anastopoulo Law Firm, LLC
32 Ann Street
Charleston, S.C. 29403

October 23, 2019

By:


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ATTORNEYS FOR RESPONDENT
ALLSTATE FIRE & CASUALTY INSURANCE
COMPANY

October 23, 2019

The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29211

RECEIVED
OCT 23 2019
SC Court of Appeals

RE: Allstate Fire and Casualty Insurance Company v. Pamela Goodwin
Appellate Case No.: 2018-001108
GWB File No.: 8300-190

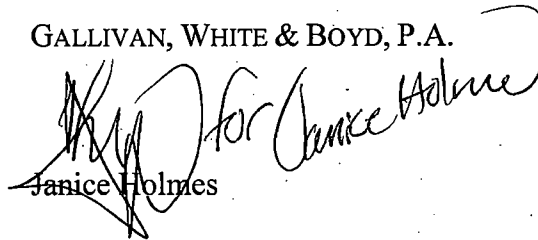
Dear Ms. Kitchings:

Enclosed for filing please find the original and seven (7) copies of Respondent's Motion to Consolidate along with Proof of Service in regards to the above-referenced matter. I would appreciate you filing these documents with the Court of Appeals and returned a clocked copy to me by the awaiting individual from my office. Thank you for your assistance with this matter.

With kind regards, I am

Very truly yours,

GALLIVAN, WHITE & BOYD, P.A.


Janice Holmes

JH:amo

Enclosure

cc: All Counsel of Record (via email only)