

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Master in Equity

---

Case No. 2017-CP-07-00241

---

RECEIVED  
NOV 04 2019  
SC Court of Appeals

Jamar Markel Bronner,

Appellant,

v.

GEICO 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:

1. Order on Motion to Remand dated April 18, 2017;
2. Order Referring Non-Jury Action to the Beaufort County Master in Equity dated June 20, 2018;
3. Order Granting GEICO's Motion for Summary for Summary [sic] Judgment dated January 17, 2019;
4. Form 4 Order dated June 6, 2019;
5. Complaint dated February 10, 2017;
6. Answer and Counterclaim dated March 8, 2017;
7. Answer and Counterclaim dated January 29, 2018;
8. Reply to Counterclaim dated January 29, 2018;
9. Plaintiff's Motion for Summary Judgment dated January 19, 2018;
10. Defendant's Motion for Summary Judgment dated February 27, 2018;

11. Motion to Alter or Amend dated January 18, 2019;
12. Memorandum in Support of Defendant's Motion for Summary Judgment and in Opposition to Plaintiff's Motion for Summary Judgment dated February 27, 2018;
13. Plaintiff's Memorandum in Support of His Motion for Summary Judgment dated October 31, 2108;
14. Plaintiff's Supplemental Memorandum in Support of His Motion for Summary Judgment dated November 12, 2108;
15. Defendant's Supplemental Memorandum in Support of Defendant's Motion for Summary Judgment and in Opposition to Plaintiff's Motion for Summary Judgment dated November 16, 2018;
16. Defendant's Memorandum in Opposition to Plaintiff's Motion to Alter or Amend dated January 28, 2019;
17. Exhibits to Memorandum in Support of Defendant's Motion for Summary Judgment and in Opposition to Plaintiff's Motion for Summary Judgment:
  - a. Exhibit 1 – declarations page;
  - b. Exhibit 2 – deposition of Jamar Markel Bronner, Sr.;
  - c. Exhibit 3 – Affidavit of Steven Stewart;
  - d. Exhibit 4 – Affidavit of Brandy Shade;
  - e. Exhibit 5 – PHIN sales application records;
  - f. Exhibit 6 – Affidavit of Bruce Brown;
  - g. Exhibit 7 – Affidavit of Rose Berridge;
  - h. Exhibit 8 – initial package of materials mailed by Defendant to Plaintiff;
  - i. Exhibit 9 – Defendant's letter to Plaintiff dated May 1, 2015;
  - j. Exhibit 10 – envelope and executed option form.
18. Defendant's Answers to Plaintiff's First Interrogatories dated September 1, 2017;
19. Excerpts from deposition of Rose Bettridge (Defendant's Rule 30(b)(6), SCRCF, designee) from *GEICO Indem. Co. v. Scites*, case no. 15-CP-08-1215 (p. 1; p. 5, line 14 to p. 6, line 3; p. 8, lines 7-23; p. 9, lines 3-22; p. 31, lines 11-25; p. 33, line 1 to p. 34, line 7; p. 34, line 20 to p. 35, line 18; p. 36, lines 5-10; p. 36, lines 14-15; p. 37, line 3 to p. 39, line 11; p. 41, line 2 to p. 43, line 8; p. 47, line 1 to p. 48, line 19;

p. 49, line 9 to p. 50, line 7; p. 57, line 21 to p. 58, line 12; p. 69, line 19 to p. 70, line 17; p. 71, line 12-18; p. 71, line 21 to p. 72, line 18).

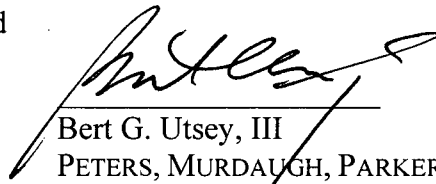
20. Excerpts from deposition of Steven Stewart (p. 1; p. 10, line 12 to p. 11, line 8; p. 13, line 14 to p. 14, line 11; p. 46, line 7 to p. 54, line 23; p. 56, line 15 to p. 57, line 14; p. 59, line 22 to p. 62, line 10; p. 63, line 20 to p. 68, line 12; p. 70, line 12 to p. 71, line 10; p. 72, line 10 to p. 74, line 14; p. 75, line 23 to p. 77, line 13; p. 77, line 24 to p. 78, line 25; p. 79, line 17 to p. 82, line 19).

21. Excerpts from Transcript of Hearing on October 31, 2018 (pp. 1, 4-6, 10-42, 49-50).

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

J. Olin McDougall  
MCDUGALL LAW FIRM  
Post Office Box 1336  
Beaufort, SC 29901  
(843) 379-7000  
[lin@mlf.law](mailto:lin@mlf.law)

and



Bert G. Utsey, III  
PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, P.A.  
P.O. Box 30968  
Charleston, SC 29417  
(843) 818-4399  
[butsey@pmped.com](mailto:butsey@pmped.com)

October 30, 2019  
Charleston, South Carolina

Attorneys for Appellants

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Marvin H. Dukes, III, Master in Equity

Case No. 2017-CP-07-00241

RECEIVED  
NOV 04 2019  
SC Court of Appeals

Jamar Markel Bronner,

Appellant,

v.

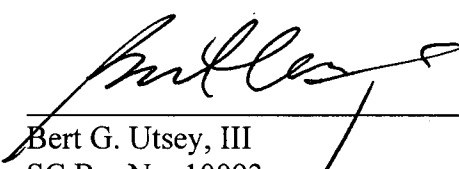
GEICO Indemnity Company,

Respondent.

PROOF OF SERVICE

I certify that I have served the INITIAL BRIEF OF APPELLANT and DESIGNATION OF MATTER TO BE INLCUED IN THE RECORD ON APPEAL upon the Respondent herein by mailing same via U.S. First Class Mail, postage prepaid, on October 30, 2019, addressed to:

Thomas H. Milligan, Esquire  
MILLIGAN & HERNS, P.C.  
721 Long Point Rd., Ste. 401  
Mt. Pleasant, SC 29464

  
Bert G. Utsey, III  
SC Bar No. 10093  
Post Office Box 30968  
Charleston, SC 29417  
(843) 818-4399  
Attorney for Appellant

October 30, 2019  
Charleston, South Carolina

LAW OFFICES  
PETERS, MURDAUGH, PARKER, ELTZROTH & DETRICK  
PROFESSIONAL ASSOCIATION

JOHN E. PARKER  
DANIEL E. HENDERSON  
MARK D. BALL  
RANDOLPH MURDAUGH, IV  
RONNIE L. CROSBY  
R. ALEXANDER MURDAUGH  
BERT G. UTSEY, III  
GRAHAME E. HOLMES  
LEE D. COPE  
MATTHEW V. CREECH  
WILLIAM F. BARNES, III  
LEAGUE B. CREECH  
STEVEN D. MURDAUGH  
AUSTIN H. CROSBY  
NEIL E. ALGER  
JOHN E. PARKER, JR.

706 ORLEANS ROAD, SUITE 101  
CHARLESTON, SOUTH CAROLINA 29407  
WWW.PMPED.COM  
TEL: (843) 818-4399  
FAX: (803) 914-6716  
EMAIL: butsey@pmped.com

RANDOLPH MURDAUGH, SR  
(1887-1940)  
RANDOLPH MURDAUGH, JR.  
(1915-1998)  
J. ROBERT PETERS, JR.  
(1927-2008)  
J. PAUL DETRICK  
(1948-2016)  
CLYDE A. ELTZROTH, JR.  
(INACTIVE)  
RANDOLPH MURDAUGH, III  
(OF COUNSEL)

October 30, 2019

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211-1629

RE: Jamar Markel Bronner v. GEICO  
Appellate Case No. 2019-001096

RECEIVED  
NOV 04 2019  
SC Court of Appeals

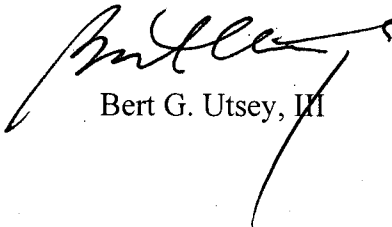
Dear Ms. Kitchings:

Enclosed are original and one copy each of the Initial Brief of Appellant and Designation of Matter to be included in the Record on Appeal in the above-referenced matter. Please file the originals, clock the copies and return same to me in the provided self-addressed stamped envelope for my file.

By copy of this transmittal to counsel of record, I am serving copies of the enclosed upon the Respondent herein.

Thank you for your kind assistance with this request.

Sincerely,



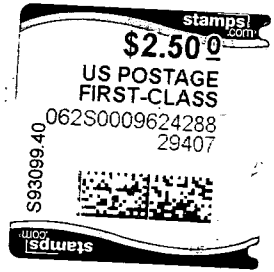
Bert G. Utsey, III

BGU/hd  
Enclosures

cc: Thomas H. Milligan, Esquire  
J. Olin McDougall, Esquire

OTHER OFFICES: 101 MULBERRY STREET EAST, P.O. BOX 457, HAMPTON, SOUTH CAROLINA 29924 | TEL.: (803) 943-2111  
690 NORTH GREEN STREET, P.O. BOX 2500, RIDGELAND, SOUTH CAROLINA 29936 | TEL.: (843) 726-6131  
123 SOUTH WALTER STREET, P.O. BOX 1164, WALTERBORO, SOUTH CAROLINA 29488 | TEL.: (843) 549-9544

PETERS, MURDAUGH, PARKER,  
ELTZROTH & DETRICK, PA  
706 ORLEANS ROAD, SUITE 101  
CHARLESTON, SOUTH CAROLINA 29407



RECEIVED  
NOV 04 2019  
SC Court of Appeals

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211-1629