

**STATE OF SOUTH CAROLINA
In the Court of Appeals**

Appeal from Darlington County
Court of Common Pleas
Paul M. Burch, Circuit Court Judge

Case No. 2015-CP-16-00815
Appeal No. 2018-001108

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Respondent,
SC Court of Appeals

Allstate Property and Casualty Insurance Company.....

v.

Pamela Goodwin.....Appellant.

APPELLANT’S RESPONSE TO RESPONDENT’S MOTION TO CONSOLIDATE

Appellant Pamela Goodwin (“Goodwin”), by and through the undersigned counsel, hereby responds to Appellant Allstate Fire and Casualty Insurance Company’s (“Allstate”) Motion to Consolidate as follows:

1. Appellant Goodwin does not oppose Allstate’s Motion to Consolidate the present action with Appellate Case No. 2018-001675, captioned Allstate Property and Casualty Insurance Company v. Natoshia Hamilton and Kenneth Collins Coogler (the “Hamilton Action”).
2. However, while Appellant Goodwin agrees that the present action and the Hamilton Action share common issues which necessitate consolidation, Appellant Goodwin does not agree with Respondent’s characterization that the sole question is “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. Instead, Appellant Goodwin asserts that the common question is characterized as follows:
“whether South Carolina continues to recognize the mirror-image rule.”
4. Accordingly, Appellant asks that if this Honorable Court consolidates the present matter and the Hamilton Action, that this court also consolidate those matters with Appellate Case No. 2019-000856, captioned Debra O’Connor, as Personal Representative of the Estate of Sandy Lynn Shook v. Aaron Collier (the “Shook Action”).
5. In support of Appellant Goodwin’s request, she asserts that the present action, the Hamilton Action, and the Shook Action share the same common question.

WHEREFORE, for the reasons stated herein and upon good cause shown, Appellant Goodwin would ask that the present action, and Hamilton Action, and the Shook Action be consolidated.

[Signature Block on Following Page]

Respectfully Submitted,

ANASTOPOULO LAW FIRM, LLC

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10/31, 2019

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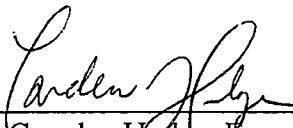
CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date a copy of the foregoing document, the Appellant's Response to Respondent's Motion to Consolidate, was duly served upon each party and potential party to this cause via USPS, properly addressed as follows:

Attn: A. Johnston Cox, Esq.
Gallivan, White & Boyd, PA
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Columbia, SC 29202

Attn: Michael T. Coulter and Michelle N. Endemann
PO Box 6728
Greenville, SC 29606

ANASTOPOULO LAW FIRM, LLC



J. Camden Hodge, Esq.

Dated: This 31 day of October, 2019

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*OF COUNSEL

October 31, 2019

Via USPS

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

Re: Allstate Fire and Casualty Insurance Company v. Pamela Goodwin
Appellate Case No.: 2018-001108

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Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of the Appellant's Response to Respondent's Motion to Consolidate in the above-referenced matter, along with a Proof of Service. I would appreciate you filing these documents and returning a filed copy to me in the enclosed, self-addressed and pre-stamped envelope. Thank you for your assistance in this matter.

Sincerely,


J. Camden Hodge

cc: Johnston Cox
Michael T. Coulter
Michelle N. Endemann

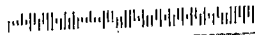
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