

92175

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SUMTER COUNTY  
In the Court of Common Pleas

RECEIVED

George M. McFaddin, Jr., Circuit Court Judge FEB 14 2020

SC Court of Appeals

Case No. 2016-CP-43-01521

Government Employees Insurance Company, ..... Respondent,

v.

Barbara P. Jackson, as Personal Representative  
for the Estate of Vincent A. Jackson, ..... Appellant.

NOTICE OF APPEAL

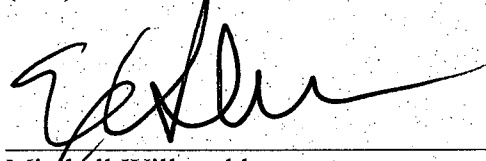
Barbara P. Jackson, as Personal Representative for the Estate of Vincent A. Jackson, hereby  
appeals:

- (a) The Order Granting Plaintiff's Motion to Exclude the Testimony of Dr. Pitner, and Denying Defendant's Motions to Exclude Federal Employment Records, Death Certificate and Coroner's Testimony and Arrest and Booking Report, as reflected in the Memo Opinion dated May 28, 2019 and received by Appellant on May 28, 2019 (attached as Exhibit A);
- (b) The Verdict in this matter dated May 30, 2019 and received by Appellant on May 30, 2019 (attached as Exhibit B); and
- (c) The Form 4 Judgment in a Civil Case of the Honorable George M. McFaddin, Jr. filed on May 31, 2019 and received by Appellant on May 31, 2019 (attached as Exhibit C); and

- (d) The Order Denying Defendant's Motion for Judgment Notwithstanding the Verdict, or, in the Alternative, a New Trial of the Honorable George M. McFaddin, Jr. filed January 17, 2020 and received by Appellant on January 17, 2020 (attached as Exhibit D).

Respectfully submitted,

Calvin K. Hastie, Sr.  
**HASTIE LAW FIRM**  
7 East Hampton Avenue  
Sumter, South Carolina 29150  
(803) 774-7776



---

Mitchell Willoughby  
Elizabeth Zeck  
**WILLOUGHBY & HOEFER, P.A.**  
930 Richland Street  
Post Office Box 8416  
Columbia, SC 29202-8416  
(803) 252-3300

*Attorneys for Appellant Barbara P. Jackson,  
as Personal Representative for the Estate of  
Vincent A. Jackson*

February 14, 2020  
Columbia, South Carolina

Other Counsel of Record:

John Robert Murphy  
**MURPHY & GRANTLAND, P.A.**  
Post Office Box 6648  
Columbia, South Carolina 29260  
(803) 454-1231

G. Murrell Smith, Jr.  
**SMITH ROBINSON HOLLER DUBOSE  
MORGAN, LLC**  
Post Office Box 580  
Sumter, South Carolina 29150  
(803) 780-2471

*Attorneys for Respondent  
Government Employees Insurance Company*

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SUMTER COUNTY  
In the Court of Common Pleas

George M. McFaddin, Jr., Circuit Court Judge

Case No. 2016-CP-43-01521

RECEIVED

FEB 14 2020

SC Court of Appeals

Government Employees Insurance Company,.....Respondent,

v.

Barbara P. Jackson, as Personal Representative  
for the Estate of Vincent A. Jackson,.....Appellant.

**PROOF OF SERVICE**

This is to certify that I, Laura Lee Andrews, a paralegal with the law firm Willoughby & Hofer, P.A., have caused to be served this day one (1) copy of Appellant Barbara P. Jackson, as Personal Representative for the Estate of Vincent A. Jackson's **Notice of Appeal** by placing same in the care and custody of the United States Postal Service with first class postage affixed thereto and addressed as follows:

John Robert Murphy, Esquire  
**MURPHY & GRANTLAND, P.A.**  
Post Office Box 6648  
Columbia, South Carolina 29260

G. Murrell Smith, Jr., Esquire  
**SMITH ROBINSON HOLLER DUBOSE**  
**MORGAN, LLC**  
Post Office Box 580  
Sumter, South Carolina 29150

  
Laura Lee Andrews

Columbia, South Carolina  
This 14<sup>th</sup> day of February, 2020

**WILLOUGHBY & HOEFER, P.A.**  
ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL\*\*  
TRACEY C. GREEN  
CHAD N. JOHNSTON  
JOHN W. ROBERTS  
ELIZABETH ZECK\*  
ELIZABETHANN LOADHOLT CARROLL  
R. WALKER HUMPHREY, II\*\*\*  
ANDREW R. HAND\*\*\*\*  
J. JOSEPH OWENS

ELIZABETH S. MABRY  
JAMES PATRICK HUDSON  
OF COUNSEL

JOSEPH H. FARRELL, III  
SPECIAL COUNSEL

\*ALSO ADMITTED IN TEXAS

\*\*ALSO ADMITTED IN WASHINGTON, D.C.

\*\*\*ALSO ADMITTED IN CALIFORNIA

\*\*\*\*ALSO ADMITTED IN NORTH CAROLINA

**VIA HAND DELIVERY**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

February 14, 2020

RECEIVED  
FEB 14 2020  
SC Court of Appeals

RECEIVED  
FEB 14 2020  
SC Court of Appeals

RE: *Government Employees Insurance Company vs. Barbara P. Jackson, as Personal Representative for the Estate of Vincent A. Jackson; C/A No. 2016-CP-43-01521*  
Notice of Appeal

Dear Ms. Kitchings:

Enclosed for filing please find the original and one (1) copy of a **Notice of Appeal** on behalf of Appellant Barbara P. Jackson, as Personal Representative for the Estate of Vincent A. Jackson in the above-referenced matter.

By copy of this letter to counsel, I am serving Respondent Government Employees Insurance Company with a copy of this Notice and enclose a proof of service to that effect. Also enclosed, please find a check in the amount of \$250 for the filing fee.

I would appreciate your acknowledging receipt of this Notice of Appeal by file stamping the extra copy of the Notice and returning it to me via our courier.

OFFICES:

COLUMBIA

930 RICHLAND STREET  
P.O. BOX 8416  
COLUMBIA, SC 29202-8416

AREA CODE 803  
TELEPHONE 252-3300  
FAX 256-8062

CHARLESTON

133 RIVER LANDING DRIVE  
SUITE 200  
CHARLESTON, SC 29492

AREA CODE 843  
TELEPHONE 619-4426  
FAX 619-4430

(continued...)


The Honorable Jenny Abbott Kitchings  
February 14, 2020  
Page 2 of 2

---

If you have any questions, or require additional information, please do not hesitate to contact me. With best regards, I am,

Respectfully,

**WILLOUGHBY & HOEFER, P.A.**



Elizabeth Zeck

Enclosures

cc: John Robert Murphy, Esquire (via U.S. Mail and email with enclosures)  
G. Murrell Smith, Jr., Esquire (via U.S. Mail and email with enclosures)  
Calvin K. Hastie, Sr., Esquire (via email with enclosures)