

IN THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM KERSHAW COUNTY  
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Appellate Case No.: 2019-000624

**RECEIVED**

**Apr 21 2020**

**SC Court of Appeals**

Dottie R. Bell.....Appellant,

v.

John C. Bentley .....Respondent.

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**SECOND SUPPLEMENTAL RECORD ON APPEAL**

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**INDEX FOR SECOND SUPPLEMENTAL RECORD ON APPEAL**

**IV. EXHIBITS AND DOCUMENTS**

Defendant’s Response to Plaintiff’s First Supplemental Requests for Interrogatories  
and Production of Documents dated May 10, 2018.....00001

**V. CERTIFICATE OF COUNSEL.....00006**



**WALKER ALLEN**  
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May 10, 2018

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Re: Dottie R. bell v. john C. Bentley  
2016-CP-28-01087

Dear Attorney(s):

Enclosed from the above referenced matter are Defendant's First Responses to Plaintiff's First Supplemental Requests for Interrogatories and Production of Documents.

With kindest regards,

**WALKER ALLEN GRICE AMMONS & FOY LLP**

*s/Carrie Hailman O'Brien*

Carrie Hailman O'Brien

CHO/tlm

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Supp. ROA 00001

STATE OF SOUTH CAROLINA )  
COUNTY OF KERSHAW )  
Dottie R. Bell, )  
Plaintiff(s), )  
vs. )  
John C. Bentley, )  
Defendant(s). )

IN THE COURT OF COMMON PLEAS

Civil Action No. 2016-CP-28-01087

**DEFENDANT’S FIRST RESPONSES TO  
PLAINTIFF’S FIRST SUPPLEMENTAL  
REQUESTS FOR INTERROGATORIES  
AND PRODUCTION OF DOCUMENTS**

**FIRST SUPPLEMENTAL INTERROGATORIES**

1. State the names, addresses, relationship and telephone numbers of the individual(s) who has informed Defendant and/or Defendant’s counsel that the Defendant has died.

**RESPONSE:** Brice McKoy

U.S. Army Corps of Engineers  
Chief, Northwest Regulatory Branch  
Columbia, South Carolina  
803.253.3444

2. Identify any person counsel or the family is aware of that attended Defendant’s funeral.

**RESPONSE:** The undersigned has previously notified Plaintiff’s counsel that Mr. Bentley passed away. The owner of the vehicle being driven by Mr. Bentley was Dr. McKoy. It was determined by counsel that Dr. McKoy had passed away. Counsel contacted Dr. McKoy’s son to inquire as to how Mr. Bentley might be located. Mr. McKoy notified counsel at said time that Mr. Bentley passed away prior to this case ever going into litigation. Thus, there is no way service could be proper in this case considering he had passed away and the affidavit claims service was on Mr. Bentley personally. Counsel has no further information and has not been able to obtain any information beyond what has been previously shared with counsel.

3. State the cemetery where Defendant is buried.

**RESPONSE:** Unknown.

4. State the date of death of Defendant.

**RESPONSE:** Unknown.

5. State the date of Defendant's funeral.

**RESPONSE:** Unknown.

6. Identify any obituary for Defendant.

**RESPONSE:** Unknown.

7. Identify any funeral home who handled the embalming, cremation or any other death/burial service for Defendant.

**RESPONSE:** Unknown.

8. Identify any estate that has been opened for Defendant and state the County, State the estate was opened in.

**RESPONSE:** Unknown.

9. Identify any individual known by Counsel or Defendant's family that has applied to be the Personal Representative of the Estate of John C. Bentley.

**RESPONSE:** Unknown.

#### **FIRST SUPPLEMENTAL REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. Produce any documents identified in Defendant's responses to Plaintiff's First Supplement Interrogatories to Defendant.

2. Produce a copy of decedent's death certificate.

**RESPONSE:** None.

3. Produce any and all documents evidencing Defendant's death.

**RESPONSE:** None.

4. Produce any and all information regarding where the Defendant is buried.

**RESPONSE:** None.

5. Produce a copy of Defendant's obituary.

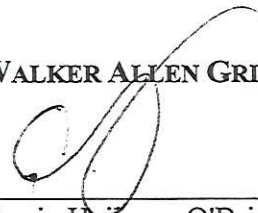
**RESPONSE:** None.

6. Produce any Petitions for Appointment, creditor's claims or other filings with the Probate Court relating to the Estate of John C. Bentley.

**RESPONSE:** None.

This the 10<sup>th</sup> day of May, 2018

**WALKER ALLEN GRICE AMMONS & FOY LLP**



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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document, Defendant's Responses to Plaintiff's First Supplemental Requests for Interrogatories and Production of Documents, was served upon all counsel of Record:


- as an attachment to an electronic correspondence
- by depositing a copy of the same in an official depository of the United States mail in a postage-paid envelope
- via facsimile, or
- by hand delivery

addressed as follows:

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jgoodwyn@goodwynlaw.com  
ATTORNEY FOR PLAINTIFF  
Dottie R. Bell

This the 10<sup>th</sup> day of May, 2018.

**WALKER ALLEN GRICE AMMONS & FOY, LLP.**

  
\_\_\_\_\_  
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v.

John C. Bentley .....Respondent.

**CERTIFICATE OF COUNSEL**

The undersigned hereby certifies that this Appendix to the Second Supplemental Record on Appeal, submitted with the consent of all attorneys of record pursuant to Rule 212(b), SCACR, contains all materials proposed to be included by any of the parties and not any other material.

GOODWYN LAW FIRM, LLC

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Columbia, South Carolina  
April 21, 2020

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