

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Trial Court Case No. 2017CP4203523

Appellate Case No. 2020-000203

**RECEIVED**  
**Jul 31 2020**  
SC Court of Appeals

Shannon P. Green,  
and Darrell Russell,

Appellant-Respondent,

v.

Edward C. McGee,  
and David Hudgins,

Respondent,  
Respondent-Appellant,


DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

In addition to documents designated by Appellant-Respondent Shannon P. Green and Respondent Progress Direct Insurance Company, Respondent-Appellant David Hudgins proposes the following be included in the Record on Appeal:

- 1 Transcript of Record of Trial, October 14-16, 2019
- 2 Defendant Hudgins Exhibit 1, 9-1-1 Call
- 3 Defendant McGee Exhibit 2, Medical Records
- 4 Verdict Form Executed October 16, 2019
- 5 Transcript of Record of Post-Trial Motions Hearing, December 20, 2019
- 6 Order Regarding Plaintiffs' Motion for a New Trial and Defendant David Hudgins' Motion for Judgment Notwithstanding the Verdict and, in the alternative, Motion for Setoff, filed January 8, 2020
- 7 David Hudgins' Motion for JNOV filed October 25, 2019
- 8 David Hudgins' Motion for Setoff filed October 25, 2019
- 9 Covenant Not to Execute for Amount of \$100,000.00
- 10 Complaint
- 11 David Hudgins' Answer to Complaint
- 12 Progressive's Answer to Complaint

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

July 31, 2020



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Attorneys for Respondent-Appellant,  
David Hudgins

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Respondent-Appellant,

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PROOF OF SERVICE

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I certify that I have served the Initial Brief of Respondent-Appellant David Hudgins for his Cross-Appeal and Designation of Matter to be Included in the Record on Appeal on all attorneys of record, by electronic delivery on July 31, 2020, addressed as follows:

Douglas A. Churdar (S.C. Bar # 11971)  
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Attorney for Appellant-Respondent Shannon P. Green

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July 31, 2020



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Attorney for Respondent-Appellant David  
Hudgins

July 31, 2020

***Via Email Only***

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

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**Re: *Shannon P. Green and Darrell Russell v. Edward C. McGee and David Hudgins***  
***Appellate Case No. 2020-000203***

Dear Ms. Kitchings:

Attached for filing please find the Initial Brief of Respondent-Appellant David Hudgins for his Cross-Appeal and Designation of Matter to be Included in the Record on Appeal, along with Proof of Service of same.

If you have any questions, please do not hesitate to contact me.

With kind regards, I am,

Sincerely,

GALLIVAN, WHITE & BOYD, P.A.



Drew Bradshaw

JAB/meb  
Enclosures

cc: Douglas A. Churdar, Esq. *(via email only)*  
Michael T. Coulter, Esq. *(via email only)*