

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

Appellate Case No. 2020-000249

RECEIVED

Oct 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.

**APPELLANT’S DESIGNATION OF MATTER TO BE
INCLUDED IN THE RECORD ON APPEAL**

Appellant Barbara P. Jackson, as Personal Representative for the Estate of Vincent A. Jackson, pursuant to Rule 209, SCACR, designates the following material to be included in the Record on Appeal:

1. Summons and Complaint, filed August 12, 2016;
2. Answer and Counterclaim, filed January 20, 2017;
3. Notice of Motion and Motion to Dismiss, filed January 20, 2017;
4. Order of Judge Cothran, dated June 21, 2017;
5. GEICO’s Motion *in Limine* to Exclude Testimony of Ronald O’Neal Pitner and Supporting Memorandum, filed May 23, 2019;
6. Jackson Estate’s Opposition to GEICO’s Motion *in Limine* to Exclude Testimony of Ronald O’Neal Pitner, filed May 27, 2019;

7. Jackson Estate's Motion *in Limine* to Exclude Federal Employment Records, filed May 24, 2019;
8. Jackson Estate's Pretrial Brief, filed May 27, 2019;
9. Ruling of Judge McFaddin on Motions *in Limine* and Trial and Jury Instructions dated May 28, 2019;
10. Jackson Estate's Requested Jury Charges;
11. Jury Charges;
12. Form 4 Statement of Judgment, dated May 31, 2019.
13. Jackson Estate's Motion for Judgment Notwithstanding the Verdict, or in the Alternative, New Trial, filed June 9, 2019;
14. Jackson Estate's Memorandum in Support of Motion for Judgment Notwithstanding the Verdict, or in the Alternative, New Trial, filed December 9, 2019;
15. GEICO's Proposed Order filed December 20, 2019;
16. Order of Judge McFaddin, denying Jackson Estate's Motion for Judgment Notwithstanding the Verdict, or in the Alternative, New Trial, dated January 17, 2020;
17. Notice of Appeal;
18. Trial Transcript, dated May 28-31, 2019, pages: cover page, 3-57, 62-75, 101-320, 328-476;
19. Post-trial Hearing Transcript, dated December 9, 2019;
20. Court's Exhibits 1 and 2;
21. Plaintiff GEICO's Trial Exhibits: 2, 8, 13, 15; and
22. Jackson Estate's Trial Exhibits: 5 and 6.

Pursuant to Rule 209(c), SCACR, the undersigned counsel for Appellant certifies that the foregoing Designation of Matter to be Included in the Record on Appeal contains no matter which is irrelevant to this appeal.

[SIGNATURE OF COUNSEL FOLLOWS]

Respectfully submitted,

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

October 14, 2020
Columbia, South Carolina

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PROOF OF SERVICE

This is to certify that the undersigned counsel, an attorney with the law firm of Willoughby & Hoefler, P.A., has 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 Initial Brief and Designation of Matter pursuant to section (g)(3) of the South Carolina Supreme Court’s Amended Order dated May 29, 2020 via electronic mail at the email address as stated in the Attorney Information System and as set forth below to the following:

John Robert Murphy, Esquire
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jrmurphy@murphygrantland.com

G. Murrell Smith, Jr., Esquire
SMITH ROBINSON HOLLER DUBOSE MORGAN, LLC
P.O. Box 580
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s/ Elizabeth Zeck
Elizabeth Zeck, S.C. Bar No. 9006

This 14th day of October, 2020
Columbia, South Carolina

WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY
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JOSEPH H. FARRELL, III
SPECIAL COUNSEL

October 14, 2020

*ALSO ADMITTED IN TEXAS

**ALSO ADMITTED IN WASHINGTON, D.C.

***ALSO ADMITTED IN CALIFORNIA

****ALSO ADMITTED IN NORTH CAROLINA

VIA ELECTRONIC FILING

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
ctappfilings@sccourts.org

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SC Court of Appeals

RE: *Government Employees Insurance Company. Respondent, v. Barbara P. Jackson, as Personal Representative for the Estate of Vincent A. Jackson, Appellant.*
Appellate Case No. 2020-00249

Dear Ms. Kitchings:

Attached for electronic filing in accordance with Supreme Court Order 2020-05-29-02, part (c)(6), and pursuant to Rule 208, SCACR, are Appellant Barbara P. Jackson, as Personal Representative for the Estate of Vincent A. Jackson's Initial Brief and Designation of Matter to be Included in the Record on Appeal. As permitted by Order 2020-05-29-02, part (c)(6), the attached electronic filing is being made via email, and as permitted by the Court, no other copies, whether paper or electronic, are being provided.

By copy of this letter, we are serving Respondent via email as permitted by Order 2020-05-29-02 part (g)(3) and enclose a proof of service to that effect.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.


Elizabeth Zeck

EZ/lla
Attachments

cc: John Robert Murphy, Esquire
G. Murrell Smith, Jr., Esquire

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