

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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Nov 09 2020

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

The Honorable Perry H. Gravely, Circuit Court Judge

Appellate Case No. 2020-001144

Kierra Johnson,.....Appellant,

v.

Greenville County, Greater Greenville Sanitation District, the South Carolina  
Department of Transportation, American Southern Insurance Company, and the  
State Fiscal Accountability Authority,.....Defendants,

Of whom American Southern Insurance Company is the.....Respondent.

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

The appellant proposes the following to be included in the record on appeal:

1. Plaintiff's Summons and Complaint, plus Exhibit A, filed on April 7, 2020.
2. SFAA answer and counterclaim filed on May 14, 2020.
3. ASI answer and counterclaim filed on May 29, 2020.
4. Replies to SFAA and ASI answer and counterclaim filed on June 1, 2020.
5. GGSD and ASI motion to dismiss and/or motion to strike filed on May 29, 2020.
6. Form 4 order dated Aug. 24, 2020.
7. Form 4 order dated Aug. 11, 2020.
8. Plaintiff's motion to reconsider filed on August 3, 2020.
9. Plaintiff's motion to dismiss and strike filed on June 1, 2020.
10. Plaintiff's demand/representation letter dated January 17, 2020.
11. ASI's response to demand/representation letter dated January 28, 2020.
12. ASI motion to dismiss filed on May 29, 2020.
13. Letter to Insurance Commission, March 21, 2018.
14. Letter from Department of Insurance, May 30, 2018.

15. FOIA request to Department of Insurance, November 26, 2018.
16. Response to FOIA request letter, December 12, 2018.

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

Respectfully submitted,

HAWKINS & JEDZINIAK, LLC

*s/ Joshua T. Hawkins*

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**Attorneys for Appellant**

Greenville, South Carolina

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**PROOF OF SERVICE**

I certify that I have served a copy of the Appellant’s Initial Brief and Designation of  
Matter, electronically to the Court of Appeals, and to the following attorney of record for the  
Respondent to the following electronic addresses, on this date November 9, 2020.

James M. Davis, Jr.  
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*s/ Joshua T. Hawkins*  
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November 9, 2020

-via electronic filing/service: ctappfilings.com-  
Ms. Jenny Abbot Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

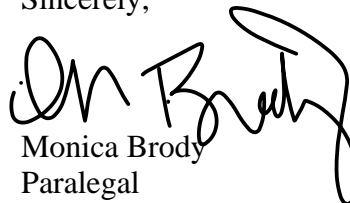
Re: *Kierra Johnson v. Greenville County, Greater Greenville Sanitation District, the South Carolina Department of Transportation, American Southern Insurance Company, and the State Fiscal Accountability Authority*  
App. Case No.: 2020-001144

Dear Ms. Kitchings:

Please find enclosed for filing Appellant's Initial Brief and Designation of Matter in the above-referenced case, along with a Proof of Service upon Respondent.

Should you need anything further, please do not hesitate to contact our office.

Sincerely,

  
Monica Brody  
Paralegal

Enclosures

CC:  
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