

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
Roger C. Young, Circuit Court Judge

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NOV 25 2020

SC Court of Appeals

Case No. 2018-CP-08-01079

Latarsha Docena-Guerrero,

Appellant,

v.

Rafael Docena-Guerrero,

Defendant

And

Government Employees Insurance
Company, as underinsured motorist
insurance carrier,

Respondent.

RESPONDENT'S DESIGNATIONS TO BE INCLUDED
IN THE RECORD ON APPEAL

Thomas H. Milligan, Esquire
(SC Bar # 12272)
Milligan & Hems, PC
721 Long Point Road, Suite 401
Mt. Pleasant, SC 29464
(843) 971-6750
tom@milliganlawfirm.com

ATTORNEYS FOR RESPONDENT

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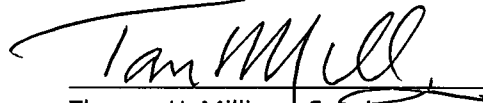
Respondent.

CERTIFICATE OF SERVICE

I, certify that I have served the RESPONDENT'S BRIEF AND DESIGNATION OF MATTERS upon the Appellant and Defendant herein by mailing same via U.S. First Class Mail, postage prepaid, on October 28, 2020, addressed to:

Steven Goldberg, Esquire
Steinberg Law Firm
Post Office Box 2670
Summerville, SC 29484

Jonathan Scott Altman, Esquire
Derfner & Altman, LLC
575 King Street, Suite B
Charleston, SC 29403



Thomas H. Milligan, Esquire
(SC Bar # 12272)
721 Long Point Road, Suite 401
Mt. Pleasant, SC 29464
(843) 971-6750

MILLIGAN  HERNs

A Professional Corporation
721 Long Point Road, Suite 401
Mt. Pleasant, SC 29464

Thomas H. Milligan*
Louis P. HERNs
Zachary F. Stohr
William J. Blount

Telephone number: (843) 971-6750
Facsimile number: (843) 971-6509
Web site: www.milliganlawfirm.com

*SC Certified Mediator
°SC Certified Arbitrator

Writer's email: tom@milliganlawfirm.com

October 28, 2020

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211-1629

RE: Latarsha Docena-Guerrero vs Rafael Docena-Guerrero and GEICO
Case Number: 2018-CP-08-01079
M&H Number: 101.20053

Dear Ms. Kitchings:

Enclosed please find the original and one copy each of the Respondent's Brief and Designation of Matter to be included in the Record on Appeal in the above-referenced matter. Please file the originals, clock the copies and return same to me in the provided self-addressed stamped envelope for my file.

By copy of this transmittal to counsel for record, I am serving copies to the enclosed upon the Appellant herein.

With kind regards, I am

Sincerely yours,


Thomas H. Milligan

THM/sbk
Enclosures

cc: Steven Goldberg, Esquire
Jonathan Altman, Esquire

The Respondent GEICO Indemnity Company proposes the following items to be included in the Record on Appeal, in addition to those items listed by the Appellant:

In addition to those items 1-14 designated for the Record on Appeal by the Appellant, the Respondent proposes that the following items be included:

15. Letter from Steven Goldberg dated 4/28/17,
16. Affidavit of Adjuster Stacie Dumas;
17. Covenant Not to Execute dated 12/19/19;
18. Emails from Steven Goldberg to Tom Milligan dated 2/21/20;
19. GEICO's Motion to Dismiss Interlocutory Appeal dated June 17, 2020.
20. GEICO's Memorandum in Support of Motion to Dismiss Interlocutory Appeal dated June 17, 2020.
21. Order Denying Motion to Dismiss dated September 10, 2020.

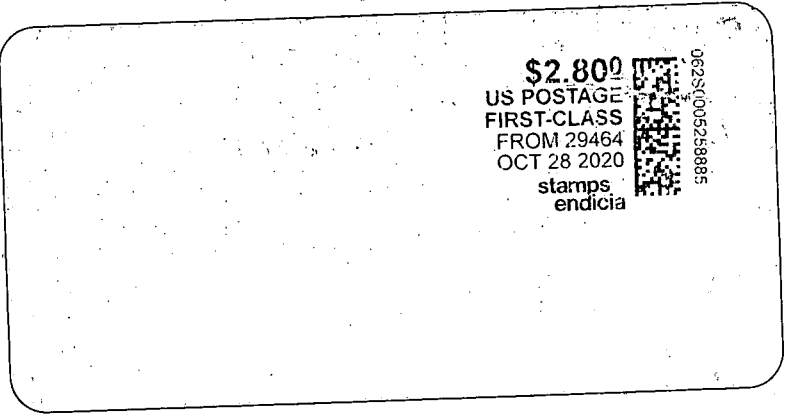
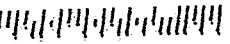
RESPECTFULLY SUBMITTED:

s/ *Tom Milligan*

Thomas H. Milligan (SC Bar # 12272)
MILLIGAN & HERNS, PC
721 Long Point Road, Suite 401
Mount Pleasant, SC 29464
Telephone: (843) 971-6750
Facsimile: (843) 971-6509
Email: tom@milliganlawfirm.com

October 28, 2020
Mt. Pleasant, South Carolina

ATTORNEYS FOR GEICO
INDEMNITY COMPANY



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SC Court of Appeals

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