

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Walton J. McLeod, IV, Circuit Court Judge

Appellate Case No. 2020-001141

RECEIVED

Dec 09 2020

SC Court of Appeals

South Carolina Farm Bureau Mutual Insurance Company,
Respondent,

v.

Richard K. Longphre and Travis E. Simpson,
Defendants,

Of whom, Richard K. Longphre is Appellant.

RESPONDENT SOUTH CAROLINA FARM BUREAU MUTUAL INSURANCE
COMPANY'S DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON APPEAL

Respondent South Carolina Farm Bureau Mutual Insurance Company proposes the following be included in the Record on Appeal:

1. Respondent's Declaratory Judgment Summons and Complaint filed April 30, 2019;
2. Appellant's Answer filed June 13, 2019;
3. Respondent's Motion to Amend Declaratory Judgment Complaint filed September 19, 2019 (including Exhibit A – draft Amended Declaratory Judgment Complaint);
4. Respondent's Motion for Summary Judgment filed March 2, 2020;
5. Respondent's Memorandum in Support of Motion for Summary Judgment filed April 23, 2020, including
 - a. Exhibit A – Excerpts from Deposition of Richard Longphre
 - b. Exhibit B – Excerpts from Deposition of Travis Simpson
 - c. Exhibit C – Voluntary Statement of Richard Longphre
 - d. Exhibit D – Underlying Action Complaint
 - e. Exhibit E – Underlying Action Amended Complaint
 - f. Auto-Owners Insurance Company v. Taylor (unpublished case)
6. Appellant's Memorandum in Opposition to Respondent's Motion for Summary Judgment filed April 29, 2020;

7. Respondent's Reply Memorandum in Support of Motion for Summary Judgment filed May 4, 2020, including
 - a. Exhibit A – Excerpts from Deposition of Richard Longphre
 - b. Exhibit B – Excerpts from Deposition of Travis Simpson
8. Order granting Respondent's Motion for Summary Judgment filed July 17, 2020;
9. Appellant's Motion to Reconsider and Memorandum in Support filed July 24, 2020;
10. Respondent's Response in Opposition to Appellant's Motion to Alter or Amend filed July 28, 2020;
11. Order denying Appellant's Motion to Alter or Amend filed July 30, 2020; and
12. Appellant's Notice of Appeal dated and served August 13, 2020.

Counsel for Respondent South Carolina Farm Bureau Mutual Insurance Company certifies that this Designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,
ROE CASSIDY COATES & PRICE PA

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COUNSEL FOR RESPONDENT
SOUTH CAROLINA FARM BUREAU MUTUAL
INSURANCE COMPANY

Greenville, South Carolina
December 9, 2020

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PROOF OF SERVICE

I, the undersigned attorney with Roe Cassidy Coates & Price, hereby certify that Initial Brief of Respondent South Carolina Farm Bureau Insurance Company and Designation of Matter to be Included in Record on Appeal have been served on all counsel of record via electronic mail to the addresses indicated below:

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s/Ross B. Plyler
Ross B. Plyler

Greenville, South Carolina
December 9, 2020