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**Feb 10 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM HORRY COUNTY  
Court of Common Pleas

The Honorable Clifton B. Newman  
Circuit Court Judge

Case No.: 2016-CP-26-05356  
(Court of Appeals Case No.: 2020-001245)

Progressive Northern Insurance Co., ..... Respondent,

v.

Brandon Lawrence and Ashley Outlaw, ..... Defendants,

Of whom Brandon Lawrence is the Appellant and Ashley Outlaw is a Respondent.

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

Respondent designates the following matter to be included in the Record on Appeal:

1. Complaint (C.A. No.: 15-CP-26-6563);
2. Complaint for Declaratory Judgment (C.A. No.: 2015-CP-26-08706);
3. Complaint (Declaratory Judgment) (C.A. No.: 2016-CP-26-05356);
4. Answer and Counterclaim of Brandon Lawrence to Plaintiff’s Declaratory Judgment;
5. Plaintiff’s Reply to Defendant Brandon Lawrence’s Counterclaim;
6. Application for Progressive Insurance, p 1-9;
7. Progressive Policy Number 85576341-0 Declarations Page;
8. SC DOI Form Number 2006;
9. Deposition Transcript of Brandon Lawrence, p. 8, l. 9-18; p. 37, l. 13-20; p. 38, l. 7-24; p. 39, l. 3-17, 23-24; p. 40, l. 11-20, 25 – p. 41, l. 6; p. 41, l. 7-9, 15-17; p. 42, l. 3-5, 8-12; p. 42, l. 24 – p. 43, l. 2; p. 43, l. 3-11;
10. Deposition Transcript of Ashley Outlaw, p. 7, l. 3-25; p. 10, l. 13-15, 23 – p. 11, l. 6; p. 13, l. 22 – p. 14, l. 14; p. 27, l. 11 – p. 28, l. 11; p. 29, l. 10-14; p. 29, l. 15 – p. 30, l. 1; p. 30, l. 2-15; p. 31, l. 21-22; p. 31, l. 25 – p.32, l. 2; p. 32, l. 14-18; p. 33, l. 1-18; p. 34, l. 11-12; p. 34, l. 23 – p. 35, l. 2; p. 35, l. 3-8, 9-13; p. 36, l. 5-8, 9-11; p. 40, l. 18-22; p. 44, l. 2-14, 15-20;

11. Plaintiff's Trial Brief;
12. Defendant Brandon Lawrence's Trial Brief;
13. Transcript of Record, dated October 18, 2017;
14. Order and Judgment, dated November 21, 2017;
15. Motion to Alter, Amend and/or Reconsider the Order Granting Plaintiff's Declaratory Judgment and Other Relief;
16. Progressive Northern Insurance Company's Reply to Defendant Brandon Lawrence's Rule 59(e) Motion;
17. Transcript of Record, dated June 16, 2020;
18. Order Denying Defendants' Motion to Alter, Amend and/or Reconsider the Order and Judgment in Favor of the Plaintiff, dated August 31, 2020

The undersigned certifies this designation contains no matter which is irrelevant to this appeal.

s/ William P. Davis

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William P. Davis

BAKER, RAVENEL & BENDER, L.L.P.

3710 Landmark Drive, Suite 400

Post Office Box 8057

Columbia, South Carolina 29202

Phone: (803) 799-9091; Fax: (803) 779-3423

File No.: 10716.80

*Attorneys for Respondent Progressive Northern Insurance Co.*

Columbia, South Carolina  
February 10, 2021

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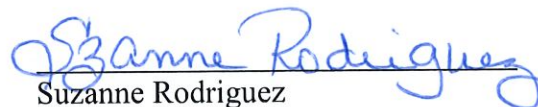
**PROOF OF SERVICE**

I, Suzanne Rodriguez, Legal Assistant to William P. Davis, an employee of Baker, Ravenel & Bender, L.L.P., Attorneys for Progressive Northern Insurance Company, Respondent, hereby certify that I have, on this 10<sup>th</sup> day of February, 2021, served Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service Thereof by mailing copies of same via United States Mail, postage pre-paid and return address clearly indicated on said envelope, to counsel of record at the following address:

Jeffrey E. Johnson  
Attorney at Law, LLC  
P.O. Drawer 1829  
Conway, SC 29528-1829

William V. Josephs, III  
Josephs Law Firm  
PO Drawer 98  
Loris, SC 29569-0098

Ashley S. Outlaw  
2824 Bethune Hwy.  
Bishopville, SC 29010-8239

  
Suzanne Rodriguez



BAKER RAVENEL BENDER  
ATTORNEYS AT LAW

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SC Court of Appeals

William P. Davis  
[wdavis@brblegal.com](mailto:wdavis@brblegal.com)  
(803) 343-3865 – direct dial

February 10, 2021

**VIA EMAIL [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Progressive Northern Insurance Co., Respondent v. Brandon Lawrence and Ashley  
Outlaw, Appellant  
Appellate Case No.: 2020-001245  
Our File No.: 10716.80

Dear Ms. Kitchings:

Attached please find for filing Respondent's Initial Brief, Designation of Matter to be Included in the Record on Appeal, and Proof of Service thereof.

By copy hereof, I am serving same upon counsel of record.

Thank you very much.

Sincerely yours,

*s/William P. Davis*

William P. Davis

WPD:sr

Enclosure

cc w/encl.:

Jeffrey E. Johnson E-Mail [firm@jjohnsonlaw.net](mailto:firm@jjohnsonlaw.net) and U.S. Mail  
William V. Josephs, III E-Mail [trey@josephslawfirm.com](mailto:trey@josephslawfirm.com) and U.S. Mail  
Ashley S. Outlaw U.S. Mail