

# WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL\*\*  
TRACEY C. GREEN  
CHAD N. JOHNSTON  
JOHN W. ROBERTS  
ELIZABETH ZECK\*  
ELIZABETHANN L. CARROLL  
ANDREW J. D'ANTONI  
R. WALKER HUMPHREY, II\*\*\*  
ANDREW R. HAND\*\*\*\*  
J. JOSEPH OWENS

ELIZABETH S. MABRY  
J. PATRICK HUDSON  
OF COUNSEL

JOSEPH H. FARRELL, III  
SPECIAL COUNSEL

April 5, 2021

\*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

**RECEIVED**

**Apr 05 2021**

**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. 2020-000249

Dear Ms. Kitchings:

Attached for electronic filing in accordance with Supreme Court Order 2020-05-29-02, part (c)(6), and pursuant to Rule 211, SCACR, are Appellant Barbara P. Jackson, as Personal Representative for the Estate of Vincent A. Jackson's Final Brief and Final Reply Brief in the above-captioned matter. Additionally, pursuant to the Court's request dated February 26, 2021, one (1) bound paper copy of the final brief and one (1) bound paper copy of final reply brief are being hand-delivered.

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

OFFICES:

COLUMBIA | 930 RICHLAND STREET, COLUMBIA, SC 29201 | 803.252.3300 FAX 803.256.8062  
CHARLESTON | 133 RIVER LANDING DRIVE, SUITE 200, CHARLESTON, SC 29492 | 843.619.4426 FAX 843.619.4490