

RECEIVED

Apr 27 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM ANDERSON COUNTY  
Court of Common Pleas  
R. Lawton McIntosh, Circuit Court Judge

Case No.: 2015-CP-02-00667  
Appellate Case No. 2020-000070

Ex Parte: Donald L. Smith,.....Appellant,

In Re: Greg Battersby,.....Plaintiff,

v.

J. Kirkman Moorhead, Krause, Moorhead  
& Draisen, P.A., Allstate Insurance Company,  
and Allstate Northbrook Indemnity Company,.....Defendants

of whom:

J. Kirkman Moorhead and Krause, Moorhead  
& Draisen, P.A. are,.....Respondents.

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

Respondents propose the following be included in the Record on Appeal:

1. All items designated in Appellant’s Designation of Matter to be Included in Record on Appeal under the caption “Battersby v. Moorhead”; however, with the correct dates that the documents were issued, and specifically:
2. Order Granting J. Kirkman Moorhead and Krause, Moorhead & Draisen, P.A.’s Motion for Summary Judgment and Motion to Dismiss dated July 8, 2015;
3. Order Granting J. Kirkman Moorhead and Krause, Moorhead & Draisen, P.A.’s Motion for Sanctions dated February 3, 2016; and
4. Form 4 Order denying Plaintiff’s Motion to Reconsider dated April 21, 2016

## CERTIFICATION

I (we) hereby certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

s/Daniel L. Draisen

**DANIEL L. DRAISEN (SC Bar# 13536)**

**THE INJURY LAW FIRM, PC**

2006 North Main Street

Anderson, South Carolina 29621

(864) 888-8887

(864) 401-8233 facsimile

daniel@injuredSC.com

and

s/Steven M. Krause (w/permission)

**STEVEN M. KRAUSE (SC Bar# 3571)**

**LAW OFFICES OF STEVEN M. KRAUSE, P.A.**

207 E. Calhoun Street

Anderson, South Carolina 29621

(864) 225-4000

steve@krauselaw.org

**ATTORNEYS FOR THE RESPONDENTS**

April 27, 2021

Anderson, South Carolina