

**RECEIVED**

**Jun 16 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Perry H. Gravely, Circuit Court Judge

---

Appellate Case No. 2020-001144  
Case No. 2020-CP-23-2023

---

Kierra Johnson, ..... Appellant,

v.

Greenville County, Greater Greenville Sanitation District, the  
South Carolina Department of Transportation, American  
Southern Insurance Company, and the State Fiscal  
Accountability Authority ..... Defendants,

Of which American Southern Insurance Company is, ..... Respondent.

---

**RESPONDENT’S DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL**

---

The Respondent American Southern Insurance Company proposes that the  
following be included in the Record on Appeal:

- (1) Order filed August 3, 2020
- (2) Form Order filed July 24, 2020

- (3) Form Order filed August 11, 2020
- (4) Complaint filed April 7, 2020
- (5) Answer and Counterclaim on Behalf of Defendants Greater Greenville Sanitation District and American Southern Insurance Company filed May 29, 2020
- (6) Notice of Motion and Motion to Dismiss and/or Motion to Strike Filed on Behalf of Defendants Greater Greenville Sanitation District and American Southern Insurance Company filed May 29, 2020
- (7) Stipulation of Dismissal of Defendant State Fiscal Accountability filed July 7, 2020
- (8) Memorandum in Support of Motion to Dismiss and/or Motion to Strike Filed on Behalf of Defendants Greater Greenville Sanitation District and American Southern Insurance Company filed July 21, 2020
- (9) Transcript of Motion Hearing, July 24, 2020, pp. 1-23

We certify that this designation contains no matter which is irrelevant to this appeal.

LINDEMANN & DAVIS, P.A.

BY: s/ Andrew F. Lindemann

ANDREW F. LINDEMANN #13030

JAMES M. DAVIS, JR. #6519

5 Calendar Court, Suite 202

Post Office Box 6923

Columbia, South Carolina 29260

(803) 881-8920

Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

Email: [jim@ldlawsc.com](mailto:jim@ldlawsc.com)

*Counsel for Respondent American Southern  
Insurance Company*

June 16, 2021

RECEIVED

Jun 16 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

---

APPEAL FROM GREENVILLE COUNTY  
Perry H. Gravely, Circuit Court Judge

---

Appellate Case No. 2020-001144  
Case No. 2020-CP-23-2023

---

Kierra Johnson, ..... Appellant,

v.

Greenville County, Greater Greenville Sanitation District, the  
South Carolina Department of Transportation, American  
Southern Insurance Company, and the State Fiscal  
Accountability Authority ..... Defendants,

Of which American Southern Insurance Company is, ..... Respondent.

---

**CERTIFICATE OF SERVICE**

---

In accordance with Section (c)(5) of the Supreme Court’s Order RE:  
Operation of the Appellate Courts During the Coronavirus Emergency (as  
amended May 29, 2020), the undersigned employee of Lindemann & Davis, P.A.,  
counsel for the Respondent American Southern Insurance Company, does hereby  
certify that service of the **Initial Brief of Respondent** and **Respondent’s  
Designation of Matter to be Included in Record on Appeal** was made upon  
Appellant’s counsel by email only this the 16th day of June 2021:

Joshua T. Hawkins, Esquire  
Helena L. Jedziniak, Esquire  
Hawkins & Jedziniak, LLC  
Email: [josh@hjllcsc.com](mailto:josh@hjllcsc.com)  
Email: [helena@hjllcsc.com](mailto:helena@hjllcsc.com)

*s/ Andrew F. Lindemann*

---



Telephone (803) 881-8920  
Facsimile (803) 862-1181

5 Calendar Court, Suite 202 (29206)  
Post Office Box 6923  
Columbia, South Carolina 29260

**ANDREW F. LINDEMANN\***  
Direct Dial: (803) 881-8921  
Email: [andrew@ldlawsc.com](mailto:andrew@ldlawsc.com)

**JAMES M. DAVIS, JR.†**  
Direct Dial: (803) 881-8922  
Email: [jim@ldlawsc.com](mailto:jim@ldlawsc.com)

\*Also Admitted in North Carolina  
†Certified Mediator

*Of Counsel*

**STEVEN R. SPREEUWERS**  
Direct Dial: (803) 373-2268  
Email: [steve@ldlawsc.com](mailto:steve@ldlawsc.com)

June 16, 2021

**Via Email Only**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Email: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Kierra Johnson v. American Southern Insurance Company  
Appellate Case Number: 2020-001144  
Civil Action Number: 2020-CP-23-2023  
Claim Number: 7045583-CJ  
Our File Number: 23.20315

**RECEIVED**  
**Jun 16 2021**  
**SC Court of Appeals**

Dear Ms. Kitchings:

In accordance with Section (c)(5) of the Supreme Court's Order RE: Operation of the Appellate Courts During the Coronavirus Emergency (as amended May 29, 2020), please find enclosed for filing the **Initial Brief of Respondent** and **Respondent's Designation of Matter to be Included in Record on Appeal** in the above referenced matter. In accordance with Section (g)(3) of this same order, I am hereby serving copies on all counsel of record by email only.

If you have any questions, please advise.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb  
Enclosures

cc: Joshua T. Hawkins, Esquire (*w/ Enclosures, Via Email Only*)  
Helena L. Jedziniak, Esquire (*w/ Enclosures, Via Email Only*)