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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Jean H. Toal
Acting Circuit Court Judge

Appellate Case No. 2021-
Circuit Court Case No. 2019-CP-40-06243

Peter D. Protopapas, as Receiver for Starr Davis Company, Inc. and
Starr Davis Company of S.C., Inc.,..... Respondents,

v.

Travelers Casualty and Surety Company f/k/a The Aetna Casualty
and Surety Company; The Standard Fire Insurance Company; St.
Paul Fire and Marine Insurance Company; The Employers' Fire
Insurance Company; Southeastern Agency Group and M.I.A.
Company, Inc. individually and as successors to or f/k/a Merrimon
Insurance Agency, Inc.; Robert E. Aspray; Nell Ashworth,
individually and as personal representative of the Estate of Robert
J. Ashworth; Betty C. D'Amico, individually and as the personal
representative of the Estate of Julian D'Amico, Jr.; Kayla Keith,
individually and as the personal representative of the Estate of Jerry
W. Archer, Sr.; Richard L. Knight II, as personal representative of
the Estate of Teddy L. Knight, Sr., and Linda Knight, individually;
David D. Rollins; James W. Smith and Frances R. Smith; and
Linda J. White, individually and as Personal Representative of the
Estate of Lubert F. White, Jr.,..... Defendants,

of whom

Travelers Casualty and Surety Company f/k/a The Aetna Casualty
and Surety Company and The Standard Fire Insurance Company
are the..... Appellants.

NOTICE OF APPEAL

Please take notice that Travelers Casualty and Surety Company f/k/a The Aetna Casualty
and Surety Company and The Standard Fire Insurance Company (together "Travelers") appeal

(1) the circuit court's order granting Starr Davis' Renewed and Supplemental Motion for Partial Summary Judgment against Travelers, which was entered on March 4, 2021; and (2) the circuit court's order denying Defendants' Motion to Reconsider, which was entered on May 19, 2021. Copies of both orders on appeal are attached. Travelers received written notice of entry of the latter of the orders on May 19, 2021, making this notice timely.

Travelers further states that the necessary transcript for this appeal has previously been ordered from and provided by the appropriate court reporters.

Finally, pursuant to Rule 404(c), SCACR, Travelers attaches hereto the order admitting Harry Lee *pro hac vice* in this matter, which was entered on January 25, 2021.

Signature Page Attached

Respectfully submitted,

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June 18, 2021

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PROOF OF SERVICE

I, the undersigned Attorney of the law offices of Womble Bond Dickinson (US) LLP, attorneys for Appellants, do hereby certify that I have served all parties in this appeal with a copy of the pleading(s) specified below through electronic mail to the addresses maintained on the AIS database:

Pleading(s): Travelers Casualty and Surety Company and The Standard Fire Insurance Company's Notice of Appeal

Parties Served: Brian M. Barnwell (bb@rplegalgroup.com)
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June 18, 2021

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Via Electronic Filing

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

Re: Peter D. Protopapas, as Receiver for Starr Davis Company, Inc. and Starr Davis Company of S.C., Inc. v. Travelers Casualty and Surety Company f/k/a The Aetna Casualty and Surety Company *et al.*
Appellate Case No. 2021-
Circuit Court Case No. 2019-CP-40-06243
Notice of Appeal

Dear Ms. Kitchings:

Please find accompanying this letter a Notice of Appeal in the above-referenced matter. The Notice is being e-filed pursuant to Section (c)(6) of Supreme Court Order 2020-05-29-02. Pursuant to that same section, we shall mail the filing fee that accompanies this Notice within five days of this filing.

We are also served this filing via email on counsel for the Plaintiffs/Respondents, as permitted by Section (g)(3) of that Order.

If the Court has any difficulty opening these electronically-submitted materials, please let us know, and we will be pleased to submit them via an alternate method.

Best regards,

/s/ M. Todd Carroll

Attachments

cc: Counsel for Plaintiffs/Respondents