

RECEIVED
Sep 16 2021
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
L. Casey Manning, Circuit Court Judge

Appellate Case No. 2021-000502
Case No. 2017-CP-40-6773

Nancy Morris, as Personal Representative of the
Estate of David Allan Woods, Appellant,

v.

State of Fiscal Accountability Authority, South Carolina Insurance
Reserve Fund, Andrew J. Bland, Richard T. Burkholder, Leemon
E. Carner, Pricilla Bland, Jerry Speissegger Jr., Defendants,

Of Whom Nancy Morris, as Assignee of Andrew J. Bland, PFC;
Leemon E. Carner, PFC; Jerry Speissegger, Jr., PFC; Priscilla
Garrett, SGT; and Richard T. Burkholder, SGT, is the Appellant,

and

South Carolina Insurance Reserve Fund is the Respondent.

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

The South Carolina Insurance Reserve Fund proposes that the following be included in the
Record on Appeal:

- (1) Order Granting Defendant's Motion for Summary Judgment filed September 26, 2019
- (2) Order Denying Plaintiff's Motion to Alter or Amend filed April 22, 2021

- (3) Form Order filed January 7, 2019
- (4) Complaint, with all attachments
- (5) Amended Complaint, with all attachments
- (6) Answer to Amended Complaint filed January 11, 2018
- (7) Defendant's Motion for Summary Judgment with attached interrogatory responses, filed April 5, 2019
- (8) Defendant's Memorandum in Support of Motion for Summary Judgment filed June 5, 2019
- (9) Defendant's Memorandum in Opposition to Renewed Motion to Compel, filed July 17, 2019
- (10) Plaintiff's Motion to Alter or Amend Order filed October 4, 2019

I 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
5 Calendar Court, Suite 202
Post Office Box 6923
Columbia, South Carolina 29260
(803) 881-8920

Counsel for Respondent
South Carolina Insurance Reserve Fund

September 16, 2021

RECEIVED
Sep 16 2021
SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
L. Casey Manning, Circuit Court Judge

Appellate Case No. 2021-000502
Case No. 2017-CP-40-6773

Nancy Morris, as Personal Representative of the
Estate of David Allan Woods, Appellant,

v.

State of Fiscal Accountability Authority, South Carolina Insurance
Reserve Fund, Andrew J. Bland, Richard T. Burkholder, Leemon E.
Carner, Pricilla Bland, Jerry Speissegger Jr., Defendants,

Of Whom Nancy Morris, as Assignee of Andrew J. Bland, PFC;
Leemon E. Carner, PFC; Jerry Speissegger, Jr., PFC; Priscilla
Garrett, SGT; and Richard T. Burkholder, SGT, is the Appellant,

and

South Carolina Insurance Reserve Fund is the Respondent.

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court's Order re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, the undersigned employee of Lindemann & Davis, P.A., counsel for the Respondent South Carolina Insurance Reserve Fund, does hereby certify that service of the **Initial Brief of Respondent** and the **Designation of Matter to be Included in the Record on Appeal of Respondent** was made upon all counsel of record by email only at the below listed email address this the 16th day of September 2021:

Garrett B. Johnson, Esquire
Elrod Pope Law Firm
Email: gjohnson@elrodpope.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

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

*Also Admitted in North Carolina
†Certified Mediator

September 16, 2021

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

RECEIVED
Sep 16 2021
SC Court of Appeals

RE: Nancy Morris, as assignee of Andrew J. Bland, PFC; Leemon E. Carner, PFC; Jerry Speissegger, Jr., PFC; Priscilla Garret, SGT; and Richard T. Burkholder, SGT v. South Carolina Insurance Reserve Fund
Appellate Case Number: 2021-000502
Civil Action Number: 2017-CP-40-6773
Claim Number: B5578
Our File Number: 104.10332

Dear Ms. Kitchings:

Pursuant to Section (b)(2) of the Supreme Court's Amended Order Re: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules, please find enclosed for filing by email only the **Initial Brief of Respondent** and the **Designation of Matter to be Included in the Record on Appeal of Respondent** in the above referenced matter. By copy of this letter, I am serving copies on all counsel of record by email only pursuant to Section (d)(1) of the same Order.

Thank you for your assistance in this matter. If you have any questions, please advise.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

cc: Garrett B. Johnson, Esquire (w/ Enclosures, Via Email Only)