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**Oct 18 2021**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
Jean Hoefler Toal, Chief Justice (Ret.)

Case No. 2019-CP-40-06243

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Appellate Case No. 2021-000648

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Peter D. Protopapas, as Receiver for Starr Davis Company, Inc. and Starr Davis Company of South Carolina, 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 Executor 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 R. White, Jr.,  
Defendants,

of which

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

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**RESPONDENTS' DESIGNATION OF MATTER**

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Pursuant to Rule 209, SCACR, Respondents Peter D. Protopapas, as Receiver for Starr Davis Company, Inc. and Starr Davis Company of South Carolina, Inc. designate the following

material for inclusion in the record on appeal. Undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to this appeal.

1. Exhibit 1 to Starr Davis' Motion for Partial Summary Judgment, filed February 28, 2021 (Order Appointing Receiver for Starr Davis, filed January 18, 2019, in *Hopper, et al. v. Air & Liquid Systems*, C/A No. 2019-CP-40-00076)

2. Motion to Appoint Receiver for Starr Davis, filed February 22, 2019, in *Hopper, et al. v. Air & Liquid Systems*, C/A No. 2019-CP-40-00076

3. Notice of Filing with Exhibits, March 4, 2021

Respectfully submitted,

s/ Shanon N. Peake

G. Murrell Smith, Jr. (S.C. Bar # 66263)

Jonathan M. Robinson (S.C. Bar # 68285)

**Shanon N. Peake (S.C. Bar #102723)**

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ATTORNEYS FOR RESPONDENTS

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v.

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Defendants,

of which

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

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**PROOF OF SERVICE**

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I certify that a true copy of the Initial Brief of Respondents and Designation of Matter in this case has been served on the following, this 18th day of October, 2021, by emailing a copy to each attorney listed below using their primary email address listed in the Attorney Information System pursuant to Rule 262 of the South Carolina Appellate Court Rules and the August 21, 2021 Order of the South Carolina Supreme Court (Appellate Case No. 2020-000447).

Counsel Served:     **E-Mail**

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*Attorneys for Appellants*

Travelers Casualty and Surety Company f/k/a The Aetna Casualty and  
Surety Company and The Standard Fire Insurance Company

*(Signature page follows)*

Respectfully submitted,

s/ Shanon N. Peake

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October 18, 2021

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**Cc:** [Jon Robinson](#); [Brian Barnwell](#); [Jescelyn Spitz](#); [Lindsay Valek](#); [Dot Faulkenberry](#)  
**Subject:** Appellate Case No. 2021-000648  
**Date:** Monday, October 18, 2021 5:31:00 PM  
**Attachments:** [Resp DOM, 2.pdf](#)  
[POS - Resp Initial Br, 4.pdf](#)  
[Starr Davis - Initial Brief of Respondents \(Redacted\).pdf](#)  
[Starr Davis - Initial Brief of Respondents \(Unredacted\).pdf](#)

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Good Afternoon,

Please find attached Respondents' Initial Brief (redacted and unredacted), Respondents' Designation of Matter, and Proof of Service that we are filing with the Court of Appeals this afternoon.

Thank you,  
Shanon



**Shanon Peake**  
*Attorney at Law*

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