



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

C.A. No: 2019-CP-40-06243
Appellate Case No. 2021-000648

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 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.

NOTICE OF WITHDRAWAL OF MOTION TO STRIKE PORTION OF RESPONDENTS'
BRIEF AND ENTRY ON RESPONDENTS' DESIGNATION OF MATTER WITHOUT
PREJUDICE

Because of the Appellants' desire to efficiently move this appeal forward to secure a ruling from the State's Appellate Courts regarding the legal points raised in this matter, please take notice that Appellants hereby withdraw their Motion to Strike Portion of Respondents' Brief and Entry on Respondents' Designation of Matter without prejudice.

Respectfully submitted,

WOMBLE BOND DICKINSON (US) LLP

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and Surety Company and The Standard Fire
Insurance Company

December 15, 2021

Dec 15 2021

SC Court of Appeals

PROOF OF SERVICE

I, the undersigned of the law offices of Womble Bond Dickinson (US) LLP, attorneys for Appellants, do hereby certify that I have served all parties to this appeal with a copy of the pleading(s) specified below by emailing them as the addresses below:

Pleading(s): Notice of Withdrawal of Motion to Strike Portion of Respondents' Brief and Entry on Respondents' Designation of Matter Without Prejudice

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By: /s/ M. Todd Carroll

December 15, 2021



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SC Court of Appeals

December 15, 2021

Via Electronic Filing

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

Re: Protopapas, as Receiver for Starr Davis Company v. Travelers Casualty and
Surety Company
Appellate Case No. 2021-000648

Dear Ms. Kitchings:

Please find attached for filing two documents: (1) a Notice of Withdrawal of Motion to Strike, and (2) a Consent Motion to Extend Deadline for Reply Brief. We are e-filing this motion pursuant to Section (b)(1) of Supreme Court Order 2021-08-25-02, and we are also serving this motion via email on counsel for the Respondents, as permitted by Section (d)(1) of that Order.

Pursuant to Section (c) of that Order, we shall mail the filing fee that accompanies this request within five days of this filing.

We appreciate the Court's consideration of these filings. If we can provide any additional materials or information, please do not hesitate to call on us.

Best regards,

/s/ M. Todd Carroll

cc: Counsel for Respondents