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RECEIVED

APR 29 2013

S.C. Supreme Court

April 29, 2013

Hand Delivered

The Honorable Daniel E. Shearouse
Clerk of Court
South Carolina Supreme Court
1231 Gervais Street
Columbia, SC 29201

RE: Dorris W. Green, Jr., as Guardian ad Litem for Inman G., a minor vs. United Services Automobile Association Auto and Property Insurance Company
Court of Appeals No. 2011197648
ALIS No. 2010-11428
Our File No. 00125/02135

Dear Mr. Shearouse:

An issue arose at oral argument on April 17 about whether USAA made payments under PIP coverage. Chief Justice Toal asked that this question be clarified. We have looked into this and have learned that in February, April and June of 2010, USAA issued 3 checks directly to providers to pay for medical treatment of Dorris I. Green. Because the payments were issued directly to the providers, Mr. McIntyre was apparently unaware of the specific payments. USAA did send Mr. McIntyre a letter on the date of the final payment – June 2, 2010 – which stated the PIP limits had been reached but did not copy Mr. McIntyre on the payments. Enclosed are records of the payments, copies of the checks and the letter of June 2, 2010 to Mr. McIntyre.

The Honorable Daniel E. Shearouse
April 29, 2013
Page 2

With kind regards, I remain

Sincerely yours,

A handwritten signature in black ink that reads "C. Mitchell Brown". The signature is written in a cursive style with a large, stylized initial "C".

C. Mitchell Brown

CMB:lpw

Enclosures

cc: Bernard McIntyre, Esquire (via facsimile and U.S. mail)
Charles R. Norris, Esquire

Auto Loss

Payment Details

Requested Date: 02/22/2010 Transaction ID: 87990221900988229740
Issued Date: 02/22/2010 Voucher ID:
Payment Amount: \$397.40 Check Number: 043069736
Currency: USD - United States (US Dollar) Requested By: 85644
Status: Cleared Bulk Payment: No

Current Allocations

Coverage	Item/Party	Benefit	Reason	Amount
Personal Injury Protection-Medical Expenses	DORRIS I GREEN	Medical bills	Standard indemnity	397.40
Payment Amount:				\$397.40

Nature of Payment: FL PIP DORRIS I GREEN PATIENT ACCT NUMBER:32474 07/19/09-07/19/09 DOC ID: UX2706568

Payee(s)

Pay to the Order of: BUFORT COUNTY EMERGENCY SERVIC PO BOX 1228

Payment Method

Payment Method: Printed Check
Return to Requestor: No

Toolbars ▶



To Bottom

Auto Loss

Payment Details ▶

Requested Date: 06/02/2010	Transaction ID: 87990221900988986090
Issued Date: 06/02/2010	Voucher ID:
Payment Amount: \$9,276.20	Check Number: 049871964
Currency: USD - United States (US Dollar)	Requested By: <u>85644</u>
Status: Cleared	Bulk Payment: No

Current Allocations

Coverage	Item/Party	Benefit	Reason	Amount
Personal Injury Protection-Medical Expenses	DORRIS I GREEN	Medical bills	Standard indemnity	9,276.20
Payment Amount:				\$9,276.20

Nature of Payment: FL PIP; BENES EXHSTDDORRIS I GREEN PATIENT ACCT NUMBER:BAF92735 07/19/09-07/19/09 DOC ID: AM2045192

Payee(s)

Pay to the Order of: BEAUFORT MEMORIAL HOSPITAL PO BOX 740209 DEPARTMENT AT 40174

Payment Method

Payment Method: Printed Check
Return to Requestor: No



To Top

Toolbars ▶



To Bottom

Auto Loss

Payment Details ▶

Requested Date: 04/15/2010 Transaction ID: 87990221900988685890
 Issued Date: 04/15/2010 Voucher ID:
 Payment Amount: 5326.40 Check Number: 046694093
 Currency: USD - United States (US Dollar) Requested By: 85644
 Status: Cleared Bulk Payment: No

Current Allocations

Coverage	Item/Party	Benefit	Reason	Amount
Personal Injury Protection-Medical Expenses	DORRIS I GREEN	Medical bills	Standard indemnity	326.40
Payment Amount:				5326.40

Nature of Payment: SC PIP DORRIS I GREEN PATIENT ACCT NUMBER:107147.07/19/09-07/19/09 DOC ID: UX2706569

Payee(s)

Pay to the Order of: BEAUFORT EMERGENCY MEDICINE PO BOX 884

Payment Method

Payment Method: Printed Check
 Return to Requestor: No

EACH OF DOCUMENTS HAS A SECURITY THREAD BACKGROUND. THE BACK CONTAINS AN OPTICAL WATERMARK, HOLD AT ANGLE TO VIEW.

DATE OF ISSUE 02/22/10

43069736



UNITED SERVICES AUTOMOBILE ASSOCIATION
PO BOX 33490
SAN ANTONIO, TX 78285

VOID 120 DAYS FROM
ISSUE DATE

\$*****397.40

USAA NR. 022199987	POLICYHOLDER DORRIS W GREEN JR	LOB AUTO	CLAIM NR. 3	LOSS DATE 07/19/09
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PAY TO THE ORDER OF

BEUFORT COUNTY EMERGENCY SERVIC
PO BOX 1228
BEAUFORT SC 29901-1228

NATURE OF PAYMENT

FL PIP
DORRIS I GREEN
PATIENT ACCT NUMBER:
32474
07/19/09-07/19/09
DOC ID: UX2706568

BANK OF AMERICA
HARTFORD, CT

⑈43069736⑈ ⑆011900445⑆

67809⑈

IF THE SECURITY FEATURES DESCRIBED ARE NOT PRESENT, DO NOT DEPOSIT THIS CHECK.

9755654

FOR DEPOSIT TO ACCOUNT OF
JOY LOGAN
TREAS. : BEAUFORT COUNTY
ANSI



UNITED SERVICES AUTOMOBILE ASSOCIATION
 PO BOX 33490
 SAN ANTONIO, TX 78265

DATE OF ISSUE: 04/15/10

46694093

FOR THE DATE FROM
 ISSUE DATE

\$*****326.40

USAA NR.	POLICYHOLDER	LOB	CLAIM NR.	LOSS DATE
022199987	DORRIS W GREEN JR	AUTO	3	07/19/09

PAY TO THE ORDER OF

BEAUFORT EMERGENCY MEDICINE
 PO BOX 884
 COLUMBIA SC 29202-0884

NATURE OF PAYMENT
 SC PIP
 DORRIS I GREEN
 PATIENT ACCT NUMBER:
 107147
 07/19/09-07/19/09
 DOC ID: UX2706569

Joe Rolle Jr

BANK OF AMERICA
 HARTFORD, CT

⑆46694093⑆ ⑆011900⑆

67809⑆

3387892

000011214 BBAI #5946
 251 WASHINGTON ST
 CHARLOTTE, NC 28202
 7800299270

For Deposit Only
 Beaufort Emergency Medicine
 BBAI
 000512895349

FOR DEPOSIT ONLY AND CASH ONLY WILL BE CASHED

FACE OF DOCUMENT HAS A MULTI-COLORED BACKGROUND. THE BACK CONTAINS AN ARTIFICIAL WATERMARK. HOLD AT ANGLE TO VIEW.

DATE OF ISSUE 06/02/10

49871964



UNITED SERVICES AUTOMOBILE ASSOCIATION
PO BOX 33490
SAN ANTONIO, TX 78265

VOID. TED DATE FROM
ISSUE DATE

\$****9,276.20

USAA NR.	POLICYHOLDER	LOS	CLAIM NR.	LOSS DATE
022199987	DORRIS W GREEN JR	AUTO	3	07/19/09

PAY TO THE ORDER OF

BEAUFORT MEMORIAL HOSPITAL
PO BOX 740209
DEPARTMENT AT 40174
ATLANTA GA 30374-0209

BANK OF AMERICA
HARTFORD, CT

NATURE OF PAYMENT
FL PIP; BENES EXHSTD
DORRIS I GREEN
PATIENT ACCT NUMBER:
BAP92735
07/19/09-07/19/09
DOC ID: AN2045192

Joe Rella Jr

49871964 022199987

67809

0000927620

3899150

PAY DEPOSIT ONLY BEAUFORT MEMORIAL HOSPITAL
PAY TO THE ORDER OF DEPARTMENT AT 40174

REGIONS BANK 06/07/10
E1121 SS 3899150-11
0620000194
0600097829



9800 Fredericksburg Road
San Antonio, Texas 78288

BERNARD MCINTYRE
PO BOX 248
BEAUFORT SC 29901-0248

June 2, 2010

Reference: Coverage Exhausted

Mr. McIntyre,

Please be advised that although Dorris I. Green is entitled to coverage under Personal Injury protection for the date of loss noted below, the coverage limit has been reached.

Patient:	Dorris I. Green
Policyholder:	Dorris W. Green
Reference #:	22199987-7102-3-7917
Date of loss:	July 19, 2009

Please submit future bills directly to the patient.

If you have questions, please call me at 1-800-531-USAA (8722).

Sincerely,

Danny C Morin
USAA Southeast Regional Office
United Services Automobile Association

22199987 - 3 - SC - 07/19/09 - 7917 - 26 - P265 -

54683-0509