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Feb 09 2022

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

The Honorable Kristi F. Curtis
Circuit Court Judge

Case No.: 2014-CP-45-00132
(Court of Appeals Case No.: 2021-000494)

South Carolina Farm Bureau Ins. Co. Appellant,

v.

Marion L. Driggers, Shiralee Driggers, Tammy D. Floyd, Arthur McKenzie, a/k/a Arther McKenzie, The Travelers Home and Marine Insurance Company, The United States of America acting by and through its agency, The Internal Revenue Services and The South Carolina Tax Commission, Defendants,

Of whom The Travelers Home and Marine Insurance Company is the Respondent.

**AMENDED DESIGNATION OF MATTER TO BE INCLUDED IN RECORD ON
APPEAL**

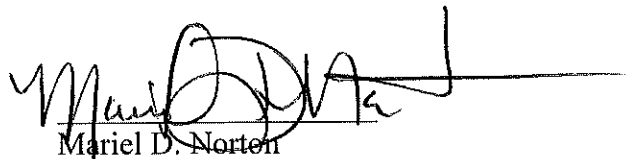
Respondent designates the following matter to be included in the Record on

Appeal:

1. Travelers Policy Number 984761288 633 1;
2. Farm Bureau Policy Number FI 0401219;
3. Complaint;
4. Defendant Arthur McKenzie's Answer to Crossclaims and attached exhibits;
5. Travelers' Answer and Cross-Claims for Interpleader;
6. Travelers' Motion for an Order Allowing Funds to be Deposited with the Court Pursuant to Rule 22(b) of the SCRCF filed 02/12/2015;
7. The United States of America's Answer;
8. Amended Complaint;
9. Answer, Counter-Claims and Cross-Claims of Defendants Shiralee Driggers and

- Tammy D. Floyd to Plaintiff's Amended Complaint;
10. Answer, Counterclaims, and Crossclaims of Marion L. Driggers, Shiralee Driggers, and Tammy D. Floyd;
 11. Order Granting Cross-Defendant The Travelers Home and Marine Insurance Company's Motion for Summary Judgment;
 12. Answer to Amended Complaint, Cross-Claims for Interpleader, and Counterclaim for Contribution of Defendant The Travelers Home and Marine Insurance Company;
 13. Order Allowing Funds to be Deposited with the Court Pursuant to Rule 22(b), SCRPC filed 01/05/2021;
 14. Notice of Motion and Motion to Alter/Amend/Reconsider and/or to Clarify filed 01/14/2021;
 15. Form 4 Judgment in Civil Case filed 04/12/2021;
 16. Defendant The Travelers Home and Marine Insurance Company's Motion for Summary Judgment as to the Third Cause of Action for Equitable Indemnity of Plaintiff filed 04/11/2021;
 17. Order Granting Defendant The Travelers Home and Marine Insurance Company's Motion for Summary Judgment as to the Cause of Action for Equitable Indemnity of Plaintiff filed 03/30/2021;
 18. Motion to Alter, Amend, Reconsider filed 04/08/2021;
 19. Form 4 Judgment in a Civil Case filed 04/12/2021;
 20. Order of Dismissal with Prejudice filed 04/19/2021;
 21. Notice of Appeal and attachments;
 22. Transcript of Record, September 17, 2020;
 23. Judge Curtis email, dated 11/19/2020;
 24. Memorandum Opposing Or Responding to Motions by Travelers & Marion L. Driggers, filed 07/06/2020;
 25. The Travelers Home and Marine Insurance Companies Response in Opposition to Plaintiff's Motion to Alter/Amend/Reconsider and/or Clarify filed 02/17/2021;

The undersigned certifies this designation contains no matter which is irrelevant to this appeal.



Mariel D. Norton
S.C. Bar No.: 100198
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
Phone: (803) 799-9091; Fax:(803) 779-3423
File No.: 7746.1749
*Attorneys for Respondent The Travelers
Home and Marine Insurance Company*
February 9, 2022

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South Carolina Farm Bureau Ins. Co. Appellant,

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Marion L. Driggers, Shiralee Driggers, Tammy D. Floyd, Arthur McKenzie, a/k/a Arther McKenzie, The Travelers Home and Marine Insurance Company, The United States of America acting by and through Its agency, The Internal Revenue Services and The South Carolina Tax Commission, Defendants,

Of whom The Travelers Home and Marine Insurance Company is the Respondent.

PROOF OF SERVICE

I, Mariel D. Norton, of Baker, Ravenel & Bender, LLC, Attorney for Respondent, hereby certify that, on this 9th day of February 2022, I have served the following with the foregoing Amended Initial Brief of Respondent The Travelers Home and Marine Insurance Company and Amended Designation of Matter to be Included in Record on Appeal via electronic mail of same to counsel of record at the e-mail addresses shown below:

J. Dwight Hudson, Esquire
Hudson Law Offices
PO Box 70218
2513 North Oak St., Ste 210
Myrtle Beach SC 29572
HUDSONLAW@HUDSONLAWOFFICE.COM
Attorneys for Appellant

Daryl J. Corbin, Esquire
Corbin Law Firm
PO Box 447
Florence, South Carolina 29503-0447
CORBINLAWFIRM@CORBINLAWSC.COM
Attorney for Estate of Arthur McKenzie

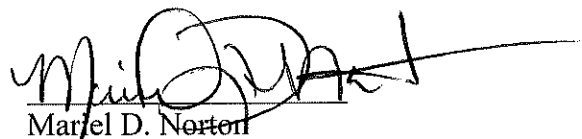
George John Conits, Esquire
U.S. Attorney's Office
55 Beatti Place, Ste. 700
Greenville, SC 29601
george.conits@usdoj.gov
Attorney for IRS

Edward K. Pritchard, III, Esquire
Pritchard Law Group, LLC
8 Cumberland Street, Suite 200
Charleston, SC 29401
epritchard@pritchardlawgroup.com
*Attorney for Defendants Shiralee Driggers
and Tammy Floyd*

Tasha B. Thompson, Esquire
S.C. State Housing Finance and
Development Authority
300 C Outlet Pointe Blvd.
Columbia, SC 29210
tasha.thompson@schousing.com
Attorney for SC Tax Commission

Reese R. Boyd, III, Esquire
Davis & Boyd, LLC
1110 London St. Suite 201 (29577)
Post Office Box 70517
Myrtle Beach, SC 29572
reese@davisboydlaw.com
Attorney for Marion L. Driggers

Vannie Williams, Jr., Esquire
The Law Office of Vannie Williams,
Jr., Esq., LLC
Post Office Box 2027
Columbia, S.C. 29202
williams.vannie@att.net
*Attorney for Audrey Graham, as PR
of the Estate of Arthur McKenzie*



Marjell D. Norton
S.C. Bar No.: 100198
BAKER, RAVENEL & BENDER, L.L.P.
3710 Landmark Drive, Suite 400
Post Office Box 8057
Columbia, South Carolina 29202
Phone:(803) 799-9091; Fax:(803) 779-3423
File No.: 7746.1749
*Attorneys for Respondent The Travelers Home
and Marine Insurance Company*
Columbia, South Carolina
February 9, 2022



BAKER RAVENEL BENDER

ATTORNEYS AT LAW

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SC Court of Appeals

Mariel Denise Norton
mnorton@brblegal.com
(803) 343-3870 – direct dial

February 9, 2022

E-mail: ctappfilings@sccourts.org

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

RE: South Carolina Farm Bureau Mutual Ins. Co., Appellant v. Marion L. Driggers, et al.
Of Which The Travelers Home and Marine Insurance Company is the Respondent
Appellate Case No.: 2021-000494
Our File No.: 7746.1749

Dear Ms. Kitchings:

Appellant filed its Second Amended Initial Designation of Matter to be Included in the Record on Appeal and its Second Amended Initial Brief of Appellant on February 3, 2022, pursuant to this Court's Order filed January 28, 2022. The page numbers of Appellant's Initial Brief changed as a result. As such, Respondent is submitting an Amended Designation of Matter to be included in Record on Appeal and an Amended Initial Brief of Respondent The Travelers Home and Marine Insurance Company to properly reference the new page numbers in Appellant's Second Amended Brief when citations to that document are made by Respondent.

As such, attached for filing in the above-referenced matter please find Amended Initial Brief of Respondent The Travelers Home and Marine Insurance Company and Amended Designation of Matter to be Included in Record on Appeal with Proof of Service thereof via electronic mail.

By copy of this letter, the same is being served upon all counsel of record via electronic mail.

If you have any questions concerning this letter, please do not hesitate to contact me.

Sincerely yours,

Mariel D. Norton

MDN:sr

Enclosures

cc w/encl.: J. Dwight Hudson, Esquire HUDSONLAW@HUDSONLAWOFFICE.COM
Daryl J. Corbin, Esquire CORBINLAWFIRM@CORBINLAWSC.COM
George John Conits, Esquire GEORGE.CONITS@USDOJ.GOV
Tasha B. Thompson, Esquire TASHA.THOMPSON@SCHHOUSING.COM
Edward K. Pritchard, III, Esquire EPITCHARD@PRITCHARDLAWGROUP.COM
Vannie Williams, Jr., Esquire WILLIAMS.VANNIE@ATT.NET
Reese R. Boyd, III, Esquire REESE@davisboydlaw.com