

RECEIVED

May 23 2022

SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

Kristi F. Curtis, Circuit Court Judge
Case No.: 2014-CP-45-00132

Case No.: 2021-000835

**South Carolina Farm Bureau Mutual
Insurance Company,**

Plaintiff-Appellant,

v.

Marion L. Driggers,

Defendant-Appellant,

and

**Shiralee Driggers, Tammy D. Floyd,
Estate of Arthur McKenzie, The
Travelers Home and Marine Insurance
Company, The United States of
America acting by and through Its
agency, The Internal Revenue Service,
and The South Carolina Tax
Commission,**

Of Whom,

**The Travelers Home and Marine
Insurance Company is the,**

Defendant-Respondent.

DESIGNATION OF MATTER

I. ORDERS

1. Order of the Williamsburg County Court of Common Pleas dated July 10, 1996 in the matter of Matthews v. McKenzie and Driggers
2. Order of the Williamsburg County Court of Common Pleas dated March 4, 2021
3. Order of the Williamsburg County Court of Common Pleas dated March 30, 2021
4. Order of the Williamsburg County Court of Common Pleas dated June 25, 2021

II. PLEADINGS

1. Complaint
2. Answer of Marion L. Driggers
3. Plaintiff's Reply to Answer
4. Answer of SC DOR
5. Answer and Crossclaim of Travelers
6. Answer of Arthur McKenzie
7. Answer of Internal Revenue Service
8. Plaintiff's Answer to Crossclaim of Travelers
9. Answer of Arthur McKenzie to Crossclaim of Travelers
10. Answer of Travelers to Crossclaim of Driggers
11. Plaintiff's Motion to Compel
12. Order Granting Motion to Compel
13. Driggers Answer to Request to Admit
14. Marion Driggers motion for Summary Judgment against Arthur McKenzie

15. Order of Continuance
16. Consent Scheduling Order
17. Consent Motion to Amend with Amended Answer
18. Marion Driggers Motion to Amend and Amended Answer
19. Marion Driggers Motion to Compel
20. Order on Motion to Compel
21. Answer of Travelers to counterclaim of Driggers
22. Marion Driggers Motion to Compel
23. Plaintiff's Motion to Amend
24. Marion Driggers Reply to Amended Crossclaim of McKenzie
25. Plaintiff's Motion to Quash
26. Answer of Arthur McKenzie to Marion Driggers' Amended Crossclaim and Amended Crossclaim of McKenzie
27. Answer of Travelers to Plaintiff's counterclaims
28. Marion Driggers Motion for Summary Judgment
29. Marion Driggers Motion to Release Counsel
30. Order on 7 pending Motions
31. Arthur McKenzie Memorandum in Opposition to Motion to Disqualify counsel
32. Marion Driggers Motion to Compel
33. Amended Complaint
34. Answer, crossclaims and counterclaim of Shiralee Driggers and Floyd
35. Answer of Marion Driggers

36. Answer of South Carolina Farm Bureau
37. Answer of Internal Revenue Service
38. Travelers Answer to Crossclaim and Counterclaim of Shiralee Driggers and Floyd
39. Travelers Answer to Plaintiff's Amended Complaint
40. Plaintiff's reply to Counterclaims of Travelers
41. Marion Driggers Motion to Compel
42. Marion Driggers Motion to Amend
43. Marion Driggers Motion for Sanctions
44. Affidavit of Elisa Richardson
45. Affidavit of Arthur McKenzie
46. Order Denying Marion Driggers motions
47. Marion Driggers Motion for Reconsideration
48. Marion Driggers Reply to McKenzie's Answer to Motion to Compel
49. Marion Driggers Mediation Memo
50. Travelers Memorandum in Opposition to Motion for Reconsideration
51. Order Motion to Compel
52. Marion Driggers Motion to Compel
53. Marion Driggers Motion for Reconsideration
54. Order Denying Motion for Reconsideration
55. Marion Driggers Motion to Produce
56. Marion Driggers Motion to Compel
57. Marion Driggers Motion to Amend Answer to include crossclaim

58. Travelers Motion for Summary Judgment
59. Travelers Motion for Summary Judgment
60. Travelers Motion for Summary Judgment
61. Plaintiff Notice for Invocation of damages cap
62. Plaintiffs' Memorandum in Support of Motion to Quash
63. Arthur McKenzie Memorandum in Opposition to Motion for Reconsideration
64. Travelers Memorandum in Opposition to Motions of Travelers and Marion Driggers
65. Plaintiff's Motion for Summary Judgment
66. Order on Plaintiff's Motion to Quash
67. Order on Marion Driggers' Motion to Amend Answer
68. Order Motion to Produce
69. Scheduling Order
70. Consent Confidentiality Order
71. Consent Order extend deadlines
72. Marion Driggers Motion for Reconsideration
73. Order Motion for Reconsideration
74. Travelers Memorandum in Opposition to Motion for Reconsideration
75. Amended Scheduling Order
76. Plaintiffs Motion to Reconsideration
77. Plaintiff's Motion for Amended Scheduling Order
78. Order denying Plaintiff's Motion to Amend
79. Order denying Plaintiff's Motion to Reconsider

80. Order dismissing Travelers
81. McKenzie Motion for Summary Judgment
82. Motion of Defendants Shiralee Driggers and Floyd for Bifurcation
83. Letter from Pritchard with exhibits in support of Motion for Bifurcation
84. Plaintiff's Reply to Motion to Bifurcate
85. Plaintiff's Notice of Appeal
86. Marion Driggers Notice of Appeal
87. Marion Driggers Request for Clarification
88. Marion Driggers Notice of Appeal
89. Marion Driggers Amended Notice of Appeal

III. LOWER COURT HEARING

1. Hearing transcript September 17, 2020
2. Hearing transcript February 18, 2021

IV. DOCUMENTS

1. Lease-Purchase Agreement between Floyd and Gamble
2. Assignment of Interest in Purchase Agreement
3. Purchase agreement between Floyd and Driggers
4. Contract of insurance between Travelers and Arthur McKenzie
5. McKenzie Loss Statement
6. Eviction Order of the Williamsburg County Magistrate Court dated March 6, 2013
7. Travelers Claim Notes

8. Travelers Damage Estimate dated March 17, 2010
9. Settlement Agreement between Travelers and Arthur McKenzie
10. Payment by Travelers to Arthur McKenzie
11. Deposition of Arthur McKenzie
12. Deposition of Marion L. Driggers

I certify that this designation contains no matter which is irrelevant to this appeal.

s/ Reese R. Boyd, III _____

Reese R. Boyd, III

Davis & Boyd LLC

1110 London Street, Suite 201

Myrtle Beach, SC 29577

Phone: (843) 839-9800

Fax: (843) 839-9801

*Attorney for Defendant-Appellant,
Marion L. Driggers*

May 23, 2022