

FILED

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

MEGAN A. JOHNSON,

Plaintiff,

v.

DANIEL C. MOSS,

Defendant.

IN THE COURT OF COMMON PLEAS

FOR THE NINTH JUDICIAL CIRCUIT

CASE NO.: 2019-CP-10-00496

**NOTICE OF APPEARANCE AND
CONDITIONAL ANSWER BY STATE
FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY
(UNDERINSURED MOTORIST)
(JURY TRIAL DEMANDED)**

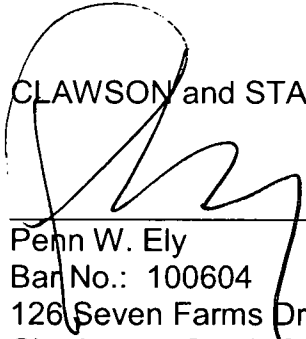
PLEASE TAKE NOTICE that the undersigned attorney appears on behalf of State Farm Mutual Automobile Insurance Company pursuant to S.C. Code § 38-77-160 (as amended), gives notice that this potential underinsured motorist carrier may provide a defense, and requests that the parties serve copies of all pleadings and discovery upon the undersigned at the address below.

The undersigned further states that he and his law firm do not represent the defendant and are not at this time undertaking such representation at this time, but are specifically reserving the option to assume control of the defense in the name of the defendant pursuant to the underinsured motorist statute if the potential underinsured motorist carrier chooses to exercise that option.

The potential underinsured motorist carrier specifically demands a jury trial pursuant to Rule 38 of the South Carolina Rules of Civil Procedure and reserves the right to any offsets, credits, setoffs or exclusions that may be available under South Carolina law and/or the terms of any applicable policy.

In filing this notice, the potential underinsured motorist carrier makes no representations or admissions as to the existence, applicability or amount of any

insurance coverage. This filing and all activities in this case are undertaken under a reservation of rights. The undersigned reserves the right to file a full Answer at such time it assumes the defense of this case or thereafter.



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Attorney for State Farm Mutual Automobile
Insurance Company

August 21, 2019

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Notice of Appearance was served upon the following parties on the 22 day of August, 2019, via:

	United States Postal Service
	Facsimile
X	Electronic Email
	Via Hand Delivery

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 2019 AUG 26 PM 2:31
 JULIE J. ARMSTRONG
 CLERK OF COURT

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Wednesday, August 21, 2019

File No.: 20191893.000

The Honorable Julie J. Armstrong
Charleston County Clerk of Court
100 Broad St Ste 106
Charleston, SC 29401-2210

Re: Megan A. Johnson vs.. Daniel C. Moss
Case No.: 2019-CP-10-00496

Dear Ms. Armstrong:

Enclosed please find an original and one copy of the Notice of Appearance and Conditional Answer in the above-referenced case. Please file the original along with the other documents in this case and return the file stamped copy to our office in the enclosed self-addressed stamped envelope. Should you have any questions, please do not hesitate to contact me.

Thank you very much for your attention to this matter.

Very truly yours,

CLAWSON and STAUBES, LLC

/s/ Penn W. Ely

Penn W. Ely

PWE/srw

Enclosure

cc: Dale Akins
Jeffrey Crudup