

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

MONIQUE C. ROBINSON,

Plaintiff,

vs.

BRITTANY E. BRYANT,

Defendant.

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IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
CASE NO.: 2018-CP-10-02598

**NOTICE OF APPEARANCE  
AND CONDITIONAL ANSWER  
ON BEHALF OF UNDERINSURED  
MOTORIST CARRIER  
PROGRESSIVE NORTHERN  
INSURANCE COMPANY**

2018 SEP -4 PM 2:49  
FILED  
CLERK OF COURT


Pursuant to S.C. Code §38-77-160, the undersigned attorney hereby serves notice of his appearance on behalf of an underinsured motorist carrier, Progressive Northern Insurance Company (hereinafter referred to as “Progressive”), in the above-entitled action and serves notice that Progressive may provide a defense in this action upon tender of limits of coverage by any liability insurance company or companies. As such, the undersigned requests that copies of all pleadings and discovery served in this action by all parties be served upon the undersigned at the address given below.

The undersigned further states that Progressive is specifically reserving the option to assume control of the defense and to defend in the name of the defendant pursuant to the underinsured motorist statute should the liability insurance company or companies exhaust the limits of available insurance coverages and should the underinsured motorist carrier. In the event Progressive assumes control of the defense of this case, whether in the name of the defendant or in its own name, Progressive specifically demands a trial by jury pursuant to Rule 38 of the South Carolina Rules of Civil Procedure.

To the extent that a responsive pleading is required by Progressive at this time, Progressive denies each and every allegation of the Complaint and demands strict proof thereof, asserts those affirmative defenses set forth in Rule 8 of the South Carolina Rules of Civil Procedure and other affirmative defenses as may have been asserted by the named defendant in her responsive pleadings, contests service of process and personal jurisdiction upon the named defendant as appropriate and preserved in her responsive pleadings, and raises those defenses set forth in Rule 12, all to the extent they are applicable. Progressive reserves the right to file a full Answer at such time it assumes the defense of this case or thereafter.

In filing this notice, Progressive makes no representations or admissions as to the existence, applicability or amount of any insurance coverage.

THIS the 31<sup>st</sup> day of August, 2018.

  
\_\_\_\_\_  
Jeffrey T. Ammons  
S.C. Bar No.: 12419  
Attorney for Progressive Northern Insurance Company  
WALKER, ALLEN, GRICE, AMMONS & FOY, L.L.P.  
P.O. Box 2047  
Goldsboro, NC 27533-2047  
919-734-6565  
[jeff@walkerallenlaw.com](mailto:jeff@walkerallenlaw.com)

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
CASE NO.: 2018-CP-10-02598

MONIQUE C. ROBINSON,  
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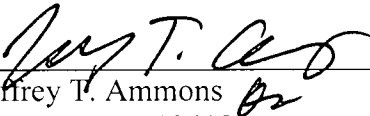
**CERTIFICATE OF SERVICE FOR  
NOTICE OF APPEARANCE  
AND CONDITIONAL ANSWER  
ON BEHALF OF UNDERINSURED  
MOTORIST CARRIER  
PROGRESSIVE NORTHERN  
INSURANCE COMPANY**

I hereby certify that the Notice of Appearance on Behalf of Underinsured Motorist Carrier Progressive Northern Insurance Company, which was dated August 31, 2018 was served upon the plaintiff on August 31, 2018, by depositing same in the U.S. Mail, postage prepaid, addressed to:

Steven E. Goldberg  
The Steinberg Law Firm, LLP  
P.O. Box 50577  
Summerville, SC 29485  
*Attorney Plaintiff*

Stephanie P. Anthony  
Weston, Craig, Anthony, LLC  
P.O. Box 1992  
Mt. Pleasant, SC 29465-1992  
*Attorney for Defendant*

THIS the 31<sup>st</sup> day of August, 2018.

  
\_\_\_\_\_  
Jeffrey T. Ammons  
S.C. Bar No.: 12419  
Attorney for Progressive Northern Insurance Company  
WALKER, ALLEN, GRICE, AMMONS & FOY, L.L.P.  
P.O. Box 2047  
Goldsboro, NC 27533-2047  
919-734-6565  
[jeff@walkerallenlaw.com](mailto:jeff@walkerallenlaw.com)

FILED  
2018 SEP -4 PM 2:49  
JULIE A. HARRINGTON  
CLERK OF COURT  
BY \_\_\_\_\_



WALKER ALLEN  
TRIAL ATTORNEYS

**WALKER, ALLEN, GRICE, AMMONS & FOY, L.L.P.**

JERRY A. ALLEN, JR.  
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ALICIA R. JOHNSON  
SARAH RAND-MCDANIEL  
CHAD B. HESS

ROBERT D. WALKER, JR.  
*Retired*

August 31, 2018

The Honorable Julie J. Armstrong  
Clerk of Court  
100 Broad Street  
Suite 106  
Charleston, SC 29401-2210

RE: Monique C. Robinson vs. Brittany E. Bryant  
Charleston County Case No.: 2018-CP-10-02598

Dear Clerk:

In regard to the above-referenced case, please mark your file to indicate that we will be appearing as counsel of record for the underinsured motorist carrier, Progressive Northern Insurance Company. We ask that you forward to our attention any and all notices or calendars concerning this case.



Enclosed herein please find originals and one copy each of Notice of Appearance on Behalf of Underinsured Motorist Carrier Progressive Northern Insurance Company and the Certificate of Service for same.

Please file these documents and return our stamped file copies in the envelope provided. By copy of this letter, I have served counsel for the plaintiff and the defendant with copies of these referenced documents.

Thank you for your attention in this matter. Should you have any questions or concerns, please contact our office.

Sincerely yours,

WALKER, ALLEN, GRICE, AMMONS & FOY, L.L.P.

  
Jeffrey T. Ammons 

JTA/nkf, 37.193  
Enclosures: As stated.

cc: Steven E. Goldberg  
Stephanie P. Anthony  
Goldsboro, NC

• Raleigh, NC • Charlotte, NC • Charleston – Mt. Pleasant, SC

Mail To: Post Office Box 2047, Goldsboro, NC 27533-2047

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