

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON	)	
	)	CASE NO.: 2018-CP-10-5875
KELLY R. DONAHUE AND CYNTHIA	)	
S. DONAHUE,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	<b>CHICAGO TITLE INSURANCE</b>
	)	<b>COMPANY'S MOTION FOR</b>
JENSEN LAW FIRM, LLC, HOLLY R.	)	<b>SUMMARY JUDGMENT</b>
JENSEN, VASSAR TITLE AGENCY,	)	
CHICAGO TITLE INSURANCE	)	
COMPANY, KEY SOUTH	)	
CONSTRUCTION, LLC AND WILLIAM	)	
M. CHIVERS,	)	
	)	
Defendants	)	
	)	

---

Defendant Chicago Title Insurance Company ("Chicago Title") hereby moves pursuant to Rule 56 of the South Carolina Rules of Civil Procedure for an order granting summary judgment as to the Fourth (declaratory judgment), Fifth (breach of contract) and Sixth (bad faith refusal to pay insurance benefits) causes of action set forth in Plaintiffs' Amended Complaint.

The grounds for this motion is there is no genuine issue of fact concerning the Plaintiffs' claims, such that Chicago Title is entitled to an order of summary judgment as to all three causes of action.

This motion may be supplemented by subsequent memoranda, affidavits and other supporting documentation.

[Signature page follows.]

WOMBLE BOND DICKINSON (US) LLP

S:// Matthew Tillman

Daniel Q. Orvin, S.C. Bar No. 13744

Dan.orvin@wbd-us.com

Matthew Tillman, S.C. Bar No. 70338

Matthew.tillman@wbd-us.com

P.O. Box 999 [5 Exchange Street, 29401]

Charleston, SC 29402-0999

Main: (843) 722-3400; Fax.: 843-723-7398

*Attorneys for Defendant Chicago Title Insurance  
Company*

June 26, 2020  
Charleston, South Carolina