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**THE STATE OF SOUTH CAROLINA
In the Supreme Court**

Feb 09 2022

S.C. SUPREME COURT

**CERTIFIED QUESTIONS FROM THE UNITED STATES
DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA**

The Hon. Mary Geiger Lewis, United States District Court Judge

Appellate Case No. 2021-001209
District Court Case No. 3:20-cv-02275

Sullivan Management, LLC,
Plaintiff,

v.

Fireman's Fund Insurance Company,
and Allianz Global Risks US
Insurance Company,
Defendants.

**MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF OF
AMERICAN PROPERTY CASUALTY INSURANCE ASSOCIATION,
NATIONAL ASSOCIATION OF MUTUAL INSURANCE COMPANIES,
AND SOUTH CAROLINA INSURANCE ASSOCIATION IN SUPPORT
OF DEFENDANTS**

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Insurance Association, National Association of Mutual Insurance Companies,
and South Carolina Insurance Association*

Pursuant to Rule 213 of the Rules of Appellate Practice, American Property Casualty Insurance Association (“APCIA”), National Association of Mutual Insurance Companies (“NAMIC”), and South Carolina Insurance Association (“SCIA”) (collectively, “Amici”) hereby move for leave to file an amicus curiae brief in support of Defendants Fireman’s Fund Insurance Company and Allianz Global Risks US Insurance Company (collectively, “Allianz”). In support of this motion, Amici respectfully submit the accompanying Memorandum.

Dated: February 9, 2022

Respectfully submitted,

By: /s/ Harmon L. Cooper
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