

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	Civil Action No. 2018-CP-25-_____
COUNTY OF HAMPTON		
Chad Westendorf, as Personal Representative of the Estate of Gloria Satterfield,)	PETITION FOR APPROVAL OF WRONGFUL DEATH SETTLEMENT
)	
Plaintiff,)	
)	
v.)	
)	
Richard A. Murdaugh,)	
)	
Defendant.)	

The Petitioner, Chad Westendorf, Personal Representatives of the Estate of Gloria Satterfield, comes before this Court pursuant to S.C. Code Ann. § 15-51-41, *et. seq.*, for an Order approving the agreement for partial settlement set forth herein.

FACTS

The Petitioner is the Personal Representatives of the Estate of Gloria Satterfield, having been appointed by the Hampton County Probate Court. Gloria Satterfield died on February 26, 2018 as a result of injuries sustained in a trip and fall accident, in Hampton County. There is a contest and controversy concerning this matter, which is in good faith.

INSURANCE

The Defendant, Richard A. Murdaugh, was covered by the Certain Underwriters at Lloyds, London with coverage limits of Five Hundred Thousand Dollars (\$500,000.00) under Coverage E – Personal Liability as well as a Five Thousand Dollar (\$5,000.00) under Coverage F – Medical Payment to Others As a result of this incident, a wrongful death claim has been asserted.

TERMS OF SETTLEMENT

The Defendant and Certain Underwriters at Lloyds, London have agreed to pay the statutory beneficiaries in the amount of Five Hundred Thousand and No/100 (\$500,000.00) Dollars, liability,

plus Five Thousand and No/100 Dollars (\$5,000.00) for medical payment, as consideration for claims or causes of action for wrongful death and survival against Defendant Richard A. Murdaugh.

The partial settlement proceeds are to be apportioned as follows:

\$475,000.00 for wrongful death and \$25,000.00 for survival action and \$5,000.00 for medical pay.

BENEFICIARIES (WRONGFUL DEATH)

The statutory beneficiaries of the wrongful death claim are as follows:

Brian Harriott

Michael Anthony Satterfield

BENEFICIARIES (SURVIVAL)

The intestate heirs are as follows:

Brian Harriott

Michael Anthony Satterfield

CREDITORS AND LIENS

None known. Specifically, Petitioner does verify in the event that other liens do exist, the Petitioner agrees to negotiate any outstanding bills, expenses, and/or liens arising from this incident from the proceeds of this settlement.

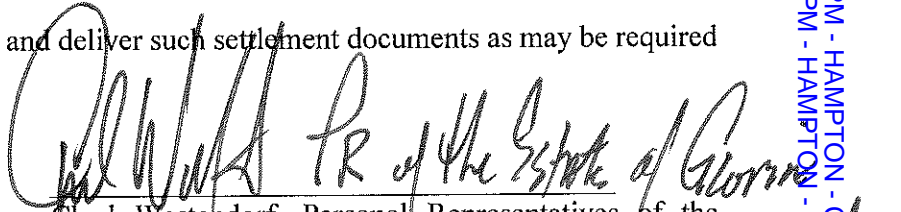
ATTORNEY'S FEES AND COSTS

One Hundred Sixty-Six Thousand Dollars and no/100 (\$166,000.00) of this amount is to be paid to Moss, Kuhn & Fleming, P.A., for attorney fees and Eleven Thousand Five Hundred and No/100 (\$11,500.00) Dollars for expenses.

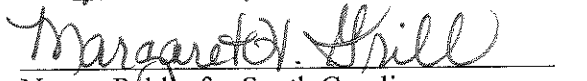
The proposed partial settlement has been negotiated by the Petitioner and the Petitioner verily believes that the effect of the partial settlement upon the interests of the person represented by the

Petitioner, in his role as Personal Representatives, to be just and reasonable. The Petitioner verily believes that it is for the best interest of the Estate of Gloria Satterfield, deceased, and her heirs, survivors and beneficiaries that the said proposed partial settlement be consummated. The Petitioner is informed and believes that the Defendant has additional insurance coverage that is applicable in this matter. This partial settlement does not release or covenant the Defendant or other insurance policies from any liability or responsibility in this matter.

WHEREFORE, your Petitioner pray that this proposed partial settlement be approved and that the Petitioner be authorized to execute and deliver such settlement documents as may be required to fully effectuate this partial settlement.


Chad Westendorf, Personal Representatives of the
Estate of Gloria Satterfield

SWORN TO AND SUBSCRIBED BEFORE ME
this 19th day of December, 2018.


Notary Public for South Carolina
My Commission Expires: 2-23-2022

