

STATE OF SOUTH CAROLINA

COUNTY OF HAMPTON

THE ESTATE OF SANDRA TAYLOR,  
by and through its Personal Representative,  
ELEASE MALLORY,

Plaintiff,

v.

DEONTRE L. COHEN and KEITH L.  
COHEN,

Defendants.

IN THE COURT OF COMMON PLEAS

Case No. 2020-CP-

**PETITION FOR APPROVAL OF  
SETTLEMENT FOR WRONGFUL  
DEATH AND SURVIVAL ACTION**

The Petition of Elease Mallory, as Personal Representative of the Estate of Sandra Taylor, deceased, respectfully shows:

1. Your Petitioner, Elease Mallory, is a resident of Hampton County, South Carolina, and was duly appointed Personal Representative for the Estate of Sandra Taylor, by Order of the Probate Court of Hampton County, South Carolina. A copy of the Certificate of Appointment is attached hereto and made a part hereof as "Exhibit A."

2. That your Petitioner's intestate Sandra Taylor, came to her death on June 1, 2019, allegedly as a result of an automobile accident caused by Deontre L. Cohen driving a vehicle owned and insured by Keith L. Cohen on June 1, 2019 in Colleton County, South Carolina. Thereafter your Petitioner, as Personal Representative aforesaid, made a claim for the alleged wrongful death and conscious pain and suffering of Sandra Taylor.

3. That because of the circumstances surrounding the incident above described, the claims and rights of action asserted or to be asserted by your Petitioner are disputed claims wherein liability has been expressly denied.

4. Petition requests that the record of this Petition and the proceedings for approval thereof be sealed and that the matter and court files be kept confidential and not disclosed, made public, disseminated, released, or otherwise referenced, alluded to, or suggested to any person in any manner whatsoever unless required by a court of competent jurisdiction.

5. That your Petitioner and Deontre L. Cohen, Keith L. Cohen, and State Farm Mutual Automobile Insurance Company have arrived at an agreed settlement for the wrongful death and conscious pain and suffering claims, as well as any and all other rights or claims for causes of action the Estate and the statutory beneficiaries might have against Deontre L. Cohen, Keith L. Cohen, and State Farm Mutual Automobile Insurance Company as a result of the subject death.

6. That there has been offered by or on behalf of Deontre L. Cohen, Keith L. Cohen, and State Farm Mutual Automobile Insurance Company a confidential sum which will be disclosed to the Court in a confidential and sealed envelope. The Settlement Agreement will resolve all claims against all of the Defendants, for both the wrongful death claims and the survivorship claims. An allocation of the settlement amounts due the Estate pursuant to the cause of action for survival and the amounts due the beneficiary pursuant to the wrongful death cause of action are shown on the confidential settlement statement. The allocation is made to the estate for the conscious pain and suffering of Sandra Taylor, and for any rights of action under Sections 15-51-10 *et seq.* of the Code of Laws of South Carolina (1976, as amended) The amounts paid to the beneficiary constitute a compromise settlement of all of the doubtful and disputed claims, demands, damages, loss of services, sorrow, grief, actions, or causes of action against Deontre L. Cohen, Keith L. Cohen, and State Farm Mutual Automobile Insurance Company, including all possible claims under Section 15-5-90 of the Code of Laws of South Carolina (1976, as amended), which your Petitioner or the statutory beneficiaries may now or hereafter have against Deontre L. Cohen, Keith L. Cohen, and

State Farm Mutual Automobile Insurance Company, as a result of the death of Sandra Taylor, on June 1, 2019.

7. That your Petitioner has been advised and is aware that any claims which Petitioners might have against Deontre L. Cohen, Keith L. Cohen, and State Farm Mutual Automobile Insurance Company are doubtful and disputed claims in which recovery might not be had if any asserted or assertable actions be brought and that your Petitioner, with the advice of counsel, recommends the acceptance of the offer of compromise and settlement of all claims, demands, damages, expenses, loss of services, grief and sorrow, and all causes of action against Deontre L. Cohen, Keith L. Cohen, and State Farm Mutual Automobile Insurance Company, personally, under Sections 15-51-10 *et seq.* of the Code of Laws of South Carolina (1976, as amended) and for all causes of action surviving or which may survive under Section 15-5-90 of the Code of Laws of South Carolina (1976, as amended).

8. That the statutory beneficiaries of the wrongful death and survival actions, the heir at law or the appropriate devisee of the Estate of Sandra Taylor, is Eleise Mallory.

9. That R. Alexander Murdaugh is the attorney for the Estate of Sandra Taylor, and that attached hereto and made a part hereof as "Exhibit B" is a Settlement Statement with a schedule of disbursements, including all known creditors of the Estate of Sandra Taylor, as well as their asserted claims and the arrangement for attorneys fees agreed upon by the Personal Representative.

WHEREFORE, Petitioner prays that she be authorized to settle the wrongful death and the conscious pain and suffering claims and all other rights and remedies available to the Estate and the statutory beneficiaries on the basis outlined above and to execute and deliver as such Personal Representative a Full and Final Release of all claims to Deontre L. Cohen, Keith L. Cohen, and State Farm Mutual Automobile Insurance Company releasing them personally from the said

wrongful death and conscious pain and suffering claims and all claims and actions surviving to the Personal Representative or any statutory beneficiaries arising, asserted or brought under or by virtue of any South Carolina or federal statute or by common law.

*Elease Mallory*

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ELEASE MALLORY, Personal Representative of the Estate of SANDRA TAYLOR

*August 19, 2021*  
~~December 19, 2020~~

*Hampton*, South Carolina

I, the undersigned attorney for the above-named Personal Representative, join in the foregoing Petition and affirm that the settlement set forth herein is fair and reasonable and in the best interests of the statutory beneficiaries and the Estate of Sandra Taylor.

*R. Alexander Murdaugh*

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R. Alexander Murdaugh  
Attorney for Petitioners

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF HAMPTON )

VERIFICATION

PERSONALLY CAME and appeared before me, Elease Mallory, who, being duly sworn, depose and say:

That they are the Personal Representative of the Estate of Sandra Taylor and that she has read the foregoing Petition and knows the contents thereof, and the same are true and correct except where stated on information and belief, which they believe to be true.

*Elease Mallory 8/18/21*  
**Elease Mallory**

SWORN to and subscribed before me  
this 19 day of August, 2020 2021

*Kristin H. Jamell*  
Notary Public for South Carolina  
My Commission Expires: 4/4/23