

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

AUG 03 2022
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SC Court of Appeals
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L. Casey Manning, Circuit Court Judge

Case No. 2020-CP-40-05802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Respondents,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Appellants.

**DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondents propose the following be included in the Record on Appeal:

1. Notice of Appeal.
2. Summons and Complaint.
3. Motion for Temporary Restraining Order November 18, 2021.
4. Temporary Restraining Order.
5. Verification.

6. Exhibit 1 to Defendants' Opposition to Motion for Temporary Restraining Order and Preliminary Injunction.
7. Exhibit 2 to Defendants' Opposition to Motion for Temporary Restraining Order and Preliminary Injunction.
8. Exhibit 3 to Defendants' Opposition to Motion for Temporary Restraining Order and Preliminary Injunction.
9. Exhibit 4 to Defendants' Opposition to Motion for Temporary Restraining Order and Preliminary Injunction.
10. Exhibit 6 to Defendants' Opposition to Motion for Temporary Restraining Order and Preliminary Injunction – list of amicus states only.
11. Plaintiffs' Motion for Temporary Injunction and Memorandum in Support with all Exhibits.
12. Order Granting Plaintiffs' Motion for a Temporary Injunction filed January 20, 2022.
13. Exh. U to Pls. Mem. in Opp. to Mot. to Dismiss filed Mar 9, 2022 (Excerpt from Act No. 89, Wis. Leg., 1967-1968 Sess., Ch. 89, Laws of 1967.)
14. Exh. V to Pls. Mem. in Opp. to Mot. to Dismiss filed Mar 9, 2022 (Proc. of the Nat'l Assoc. of Ins. Comm'rs, 1969 vol. 1 at 168-169, 241 & 271.)
15. Page 6 of Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint filed Aug. 23, 2021.

Respectfully submitted,

August 1, 2022

/s/ Geoffrey R. Bonham
Geoffrey R. Bonham
S.C. Bar No. 13058
Associate General Counsel
South Carolina Department of Insurance
P.O. Box 100105
Columbia, SC 29202
gbonham@doi.sc.gov
(803) 737-6132
Attorney for Respondents

EXHIBIT A

From: [Bessellieu, Denise](#)
To: [Geoffrey Bonham](#)
Cc: [Scott, Candice](#); [Gwen McGriff](#); [Broadbent, Michael](#)
Subject: RE: Farmer, et al. v. Altman - Service of Respondents' Initial Brief and Designation of Matter
Date: Monday, August 1, 2022 5:02:06 PM
Attachments: [image001.png](#)
[image003.png](#)

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Hi Geoff,

Thanks

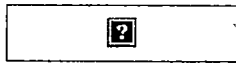
Denise Bessellieu

Associate | Cozen O'Connor

Suite 2100 301 South College Street, One Wells Fargo Center | Charlotte, NC 28202

P: 704-348-3455 F: 704-817-0933

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From: Geoffrey Bonham <gbonham@doi.sc.gov>

Sent: Monday, August 1, 2022 4:59 PM

To: Bessellieu, Denise <DBessellieu@cozen.com>

Cc: Scott, Candice <CScott@cozen.com>; Gwen McGriff <gmcGriff@doi.sc.gov>; Broadbent, Michael <MBroadbent@cozen.com>

Subject: Farmer, et al. v. Altman - Service of Respondents' Initial Brief and Designation of Matter

****EXTERNAL SENDER****

Dear Ms. Bessellieu,

Attached herewith and served upon you please find Respondents' Initial Brief and Designation of Matter in the above-referenced case.

Thank you for your attention to this matter.

Geoff

Geoffrey R. Bonham

Associate General Counsel

1201 Main Street, Suite 1000

Columbia, SC 29201

P.O. Box 100105

Columbia, SC 29202-3105

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Patrick H. Cantilo, as Special Deputy
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Company of Pennsylvania, and Senior Health
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Rehabilitation,

Appellants.

**PROOF OF SERVICE OF DESIGNATION OF MATTER
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondents Raymond G. Farmer, as Director of the South Carolina Department of Insurance, and the South Carolina Department of Insurance, by and through counsel, hereby certify that a true and correct copy of the foregoing Designation of Matter to be Included in the Record of Appeal has been served on Appellants, via electronic mail on the 1st day of August, 2022 (Delivery receipts attached hereto as Exhibit "A") as follows:

(Via Electronic Mail (Delivered: 08/01/2022))

Denise L Bessellieu, Esq.
COZEN O'CONNOR
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
dbessellieu@cozen.com
(704) 348-3455

August 1, 2022

/s/ Geoffrey R. Bonham
Geoffrey R. Bonham
S.C. Bar No. 13058
Associate General Counsel
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Attorney for Respondents

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Hi Geoff,

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Thank you for your attention to this matter.

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Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Appellants.

PROOF OF SERVICE OF INITIAL BRIEF OF RESPONDENTS

Respondents Raymond G. Farmer, as Director of the South Carolina Department of Insurance, and the South Carolina Department of Insurance, by and through counsel, hereby certify that a true and correct copy of the foregoing Initial Brief of Respondents has been served on Appellants, via electronic mail on the 1st day of August, 2022 (Delivery receipts attached hereto as Exhibit "A") as follows:

(Via Electronic Mail (Delivered: 08/01/2022))

Denise L Bessellieu, Esq.
COZEN O'CONNOR
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August 1, 2022

/s/ Geoffrey R. Bonham
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