

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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AUG 11 2022

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

SC Court of Appeals

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.

I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

August 10, 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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Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
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 on Appeal (corrected) has been served on Appellants, via electronic mail on the 10th day of August, 2022 (Delivery receipts attached hereto as Exhibit "A") as follows:

(Via Electronic Mail (Delivered: 08/10/2022))

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 10, 2022

/s/ Geoffrey R. Bonham
Geoffrey R. Bonham
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Associate General Counsel
South Carolina Department of Insurance
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Columbia, SC 29202
gbonham@doi.sc.gov
(803) 737-6132
Attorney for Respondents

Geoffrey Bonham

From: Geoffrey Bonham
Sent: Wednesday, August 10, 2022 3:23 PM
To: ctappfilings@sccourts.org
Cc: Gwen McGriff; Scott, Candice; Broadbent, Michael; Bessellieu, Denise
Subject: Farmer, et al. v. Altman - Filing of Respondents' corrected Designation of Matter
Attachments: Respondents Designation of Matter_corrected.pdf; Proof of Service of Respondents Designation of Matter (corrected) with exhibit.pdf

Appellate Case No. 2022-000219
Trial Court Case No. 2020-CP-40-05802
Farmer et al. v. Altman, et al.

Dear Clerk of Court,

Attached for filing please find Respondents' corrected Designation of Matter and Proof of Service of same in the above case.

At your earliest convenience, please provide our office with a file-stamped copy of the attached.

Thank you very much for your attention and consideration.

Geoffrey R. Bonham 

Associate General Counsel
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P.O. Box 100105
Columbia, SC 29202-3105

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RECEIVED

AUG 11 2022

SC Court of Appeals

EXHIBIT A

From: [Bessellieu, Denise](#)
To: [Geoffrey Bonham](#)
Cc: [Gwen McGriff](#); [Scott, Candice](#); [Broadbent, Michael](#)
Subject: RE: Farmer, et al. v. Altman - Service of Respondents' Designation of Matter (corrected)
Date: Wednesday, August 10, 2022 3:10:58 PM
Attachments: [image001.png](#)
[image003.png](#)

WARNING

This is an external email. DO NOT CLICK links or open attachments unless you recognize the sender and know that the content is safe.

Thank you

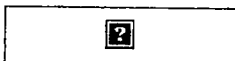
Denise Bessellieu

Associate | Cozen O'Connor

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

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Email | [Bio](#) | [LinkedIn](#) | [Map](#) | [cozen.com](#)



From: Geoffrey Bonham <gbonham@doi.sc.gov>
Sent: Wednesday, August 10, 2022 3:08 PM
To: Bessellieu, Denise <DBessellieu@cozen.com>
Cc: Gwen McGriff <gmcGriff@doi.sc.gov>; Scott, Candice <CScott@cozen.com>; Broadbent, Michael <MBroadbent@cozen.com>
Subject: Farmer, et al. v. Altman - Service of Respondents' Designation of Matter (corrected)

****EXTERNAL SENDER****

Dear Ms. Bessellieu,

Attached herewith and served upon you please find Respondents' Initial Brief and Designation of Matter (corrected) in the above-referenced case. I inadvertently omitted the certification in the original. As pointed out in the Clerk of Court's correspondence to me, I inadvertently omitted the Rule 209(c), SCACR certification in the original. The identified deficiency has been corrected in the attached.

Thank you for your attention to this matter.

Geoff

Geoffrey R. Bonham

Associate General Counsel

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