

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

NOV 01 2022

L. Casey Manning, Circuit Court Judge

SC Court of Appeals

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.

PROOF OF SERVICE OF 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 Brief of Respondents has been served on Appellants, by depositing same in the U.S. Mail, postage prepaid, and by transmitting an electronic copy via electronic mail (delivery receipt attached hereto as Exhibit "A"), on the 1st day of November 2022, addressed to counsel for Appellants as follows:

(Via U.S. Mail and Electronic Mail 11/01/2022)

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

November 1, 2022

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

EXHIBIT A

Geoffrey Bonham

From: Geoffrey Bonham
Sent: Tuesday, November 1, 2022 12:44 PM
To: 'Bessellieu, Denise'
Cc: Scott, Candice; Broadbent, Michael; Gwen McGriff; Soraya Purvis
Subject: Farmer, et al. v. Altman - Service of Brief of Respondents
Attachments: SHIP Brief of Respondents_Farmer v Altman 11012022 SC Ct App.pdf; Letter to The Hon. Jenny Abbott Kitchings_ Clerk 11012022.pdf; Proof of Service of Respondents Final-Brief.pdf

Dear Ms. Bessellieu,

Attached herewith and served upon you please find a copy of the Brief of Respondents in the above-referenced case, as well as a copy of a cover letter to the Clerk of Court that will accompany the required original and one bound copy of our Brief, together with a Proof of Service, that we are today filing with the Court of Appeals.

Thank you for your attention to this matter.

Geoff

Geoffrey R. Bonham 

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South Carolina Department of Insurance

Capitol Center
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Columbia, S.C. 29202-3105

HENRY McMASTER
Governor

MICHAEL WISE
Acting Director

November 1, 2022

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SC Court of Appeals

VIA HAND-DELIVERY

The Hon. Jenny Abbott Kitchings, Clerk
The South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Raymond Farmer, et al. v. Jessica Altman, et al.*
Appellate Case No. 2022-000219
Brief of Respondents

Dear Ms. Kitchings:

Enclosed herewith for filing please find: (1) the original Brief of Respondents and one bound copy thereof, and (2) a Proof of Service of this final Brief, both in the above-referenced matter. A copy of this submission has been served on counsel for Appellants by U.S. Mail and email. Please return clocked-in copies of the Brief and Proof of Service to me.

Thank you very much for your attention to this matter. If you have any questions regarding this submission, please do hesitate to let me know.

Respectfully,

A handwritten signature in black ink, appearing to read "Geoffrey R. Bonham".

Geoffrey R. Bonham
Associate General Counsel

Enclosures

c: Denise Bessellieu, Esq. (dbessellieu@cozen.com)
Michael J. Broadbent, Esq. (mbroadbent@cozen.com)
Candice Scott, Candice (cscott@cozen.com)