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**Jan 03 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BEAUFORT COUNTY  
Court of Common Pleas

Bentley D. Price, Circuit Court Judge

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Case No. 2016-CP-07-2541  
Appellate Case No. 2022-000231

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Forum Benefits, LLC,

Appellant,

v.

Brian Bannon and Assured Partners, NL,

Respondents.

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**APPELLANT'S SECOND DESIGNATION OF MATTER TO BE INCLUDED IN THE  
RECORD ON APPEAL**

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Appellant Forum Benefits, LLC ("Forum Benefits"), by and through its undersigned counsel, propose the following be included in the Record on Appeal:

1. Plaintiff's Verified Complaint, Filed December 1, 2016;
2. Motion for Summary Judgment, Filed March 8, 2018;
3. Memo in Support of Motion for Summary Judgment, Filed March 8, 2018
4. Response to Motion for Summary Judgment, with 13 Exhibits, Filed March 30, 2018;
5. Memo in Reply to Motion for Summary Judgment, with 1 Exhibit, Filed April 2, 2018;
6. Motion for Summary Judgment, filed June 11, 2019;
7. Order Denying Defendants' Motion for Summary Judgment, Filed June 22, 2018;

8. Response to Second Motion for Summary Judgment, filed June 27, 2019;
9. Withdrawal of Motion for Summary Judgment, filed August 22, 2019;
10. Motion for Summary Judgment, with 8 Exhibits, filed April 20, 2020;
11. Response to 4<sup>th</sup> Motion for Summary Judgment, with 14 Exhibits, filed June 7, 2020;
12. Reply in Support of Motion for Summary Judgment, with 2 Exhibits, Filed June 9, 2020;
13. Order Form 4 Denying Motion for Summary Judgment, Filed October 14, 2020;
14. Plaintiff's Motion for New Trial, Filed October 25, 2021;
15. Plaintiff's Response to Defendants' Motions for Attorneys' Fees, Filed October 25, 2021;
16. Defendants' Response in Opposition to Plaintiff's Motion for a New Trial, Filed November 1, 2021;
17. Defendants' Reply in Support of Its Motion for Attorneys' Fees/Costs and the Court's Award of Fees/Costs, Filed November 1, 2021;
18. Proposed Order for Attorneys' Fees, Filed November 9, 2021;
19. Order of Substitution of Parties, Filed November 9, 2021;
20. Order Granting Motion to Change Name of Plaintiff, Filed November 9, 2021;
21. Plaintiff's Reply in Support of Motion for a New Trial, with 4 Exhibits, Filed November 16, 2021;
22. Plaintiff's Supplemental Response to Defendants' Motions for Attorneys' Fees, Filed December 29, 2021;
23. Declaration of Brian Stritt, filed December 29, 2021;
24. Declaration of Lisa Hollingsworth-Stritt, filed December 29, 2021;
25. Declaration of Michelle Filler, filed December 29, 2021;
26. Order Granting Defendants' Motion for Directed Verdict and Awarding Prevailing Party Attorneys' Fees and Costs to Defendants, Filed February 1, 2022;
27. Plaintiff's Motion to Alter or Amend a Judgment and Supplement to its Motion for a New Trial, Filed February 11, 2022;
28. Order Denying Plaintiff's Motion to Alter or Amend a Judgment, Filed February 16, 2022;

29. Plaintiff's Exhibit 1;
30. Plaintiff's Exhibit 8;
31. Plaintiff's Proffered Exhibit 9;
32. Plaintiff's Exhibit 10;
33. Plaintiff's Exhibit 11;
34. Plaintiff's Exhibit 12;
35. Plaintiff's Exhibit 13;
36. Plaintiff's Exhibit 16;
37. Plaintiff's Exhibit 45;
38. Plaintiff's Exhibit 64;
39. Plaintiff's Exhibit 69;
40. Plaintiff's Exhibit 70;
41. Plaintiff's Exhibit 72;
42. Plaintiff's Exhibit 77;
43. Plaintiff's Exhibit 93;
44. Plaintiff's Exhibit 137;
45. Plaintiff's Exhibit 163;
46. Plaintiff's Exhibit 550;
47. Plaintiff's Exhibit 601;
48. Plaintiff's Exhibit 602;
49. Plaintiff's Exhibit 603;
50. Trial Transcript, Pages 1; 34; 38-54; 69; 72-160; 162; 165-223; 229; 239; 256-259; 263-264; 269-287; 300-309; 314-327; 333-389; 423-432; 443-444; 445; 447-472; 479-565; 586; 602; 610-616; 626-627; 634-637; 649-657; 662-663; 671-673; 675-683.
51. Hearing Transcript of January 4, 2002.

The undersigned hereby certifies, pursuant to Rule 209(c), SCACR, that Forum Benefits' Designation of Matter to be included in the Record on Appeal contains no matter that is irrelevant to the appeal.

*s/Timothy D. St. Clair*

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January 3, 2023