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**Jun 21 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

Perry H. Gravely, Circuit Court Judge  
R. Lawton McIntosh, Circuit Court Judge

Case No.: 2019-CP-23-01438

Benigna Vargas,

Appellant,

v.

MGA Insurance Company, Inc. and  
Calidad Latina, Inc.,

Respondents.

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

Appellant proposes the following to be included in the Record on Appeal:

- (1) Summons and Complaint
- (2) Answer
- (3) Plaintiff's Motion to Amend Summons and Complaint
- (4) Plaintiff's Memorandum in Support of Motion to Amend Summons and Complaint
- (5) Defendant's Memorandum in Opposition of Motion to Amend Summons and Complaint
- (6) Plaintiff's Supplemental Memorandum Regarding the Unfair Trade Practices Act
- (7) Defendant's Memorandum Regarding the Unfair Trade Practices Act
- (8) Orders Granting Plaintiff's (Appellant) Motion for Rule to Show Cause
- (9) Order Partially Granting Plaintiff's (Appellant) Motion to Amend Summons and Complaint
- (10) Motion to Alter or Amend Pursuant to Rule 59, *SCRCP*, and Motion to Reconsider Pursuant to Rule 52, *SCRCP*

- (11) Plaintiff's Memorandum in Support of her Motion to Alter or Amend Pursuant to Rule 59, *SCRCP*, and Motion to Reconsider Pursuant to Rule 52, *SCRCP*
- (12) Order Denying Plaintiff's Motion to Reconsider
- (13) Amended Summons and Complaint
- (14) Answer to Amended Summons and Complaint
- (15) Plaintiff's Motion for Partial Summary Judgment
- (16) Plaintiff's Memorandum in Support of Motion for Partial Summary Judgment
- (17) Defendant's Motion to Dismiss Fraud Claim
- (18) Plaintiff's Memorandum in Opposition to Motion to Dismiss
- (19) Defendant's Motion for Summary Judgment as to Plaintiff's Declaratory Judgment Cause of Action
- (20) Plaintiff's Memorandum in Opposition to Motion for Summary Judgment
- (21) Order Denying Plaintiff's Motion for Partial Summary Judgment and Defendants' Motion for Summary Judgment and Motion to Dismiss
- (22) Defendants' Motion for Summary Judgment as to Plaintiff's Fraud Claim
- (23) Plaintiff's Memorandum in Opposition to Motion for Summary Judgment
- (24) Order Granting Defendant's Motion for Summary Judgment as to Plaintiff's Fraud Claim
- (25) Order Dismissing Calidad Latina, Inc.
- (26) Verdict Form
- (27) Plaintiff's Motion to Alter or Amend the Grant of Summary Judgment as to Plaintiff's Fraud Claim
- (28) Memorandum in Support of Plaintiff's Motion to Alter or Amend the Grant of Summary Judgment as to Plaintiff's Fraud Claim
- (29) Plaintiff's Motion for Judgment J.N.O.V., Motion for a New Trial Absolute, and Motion to Alter or Amend Judgment Pursuant to Rules 50, 52, 59, and 60, *SCRCP*
- (30) Memorandum in Support of Plaintiff's Motion for Judgment J.N.O.V., Motion for a New Trial Absolute, and Motion to Alter or Amend Judgment Pursuant to Rules 50, 52, 59, and 60, *SCRCP*
- (31) Order Denying Plaintiff's Motion to Alter or Amend the Grant of Summary

Judgment

- (32) Order Denying Plaintiff's Plaintiff's Motion for Judgment J.N.O.V., Motion for a New Trial Absolute, and Motion to Alter or Amend Judgment Pursuant to Rules 50, 52, 59, and 60, *SCRPC*
- (33) Transcript of Deposition of Angela Beltran on November 24, 2020
- (34) Transcript of Deposition of 30(b)(6) deposition of MGA on August 19, 2022
- (35) Affidavit of William Henry Thames, III
- (36) Trial Transcript with Exhibits
- (37) Transcript from Hearing on March 24, 2021
- (38) First UIM Selection Rejection form from November 28, 2018
- (39) Second UIM Selection Rejection form from November 28, 2018
- (40) Third UIM Selection Rejection form from November 28, 2018
- (41) Complete UIM Selection Rejection form
- (42) Calidad Subpoena Response

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

s/Raymond T. Wooten  
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**CERTIFICATE OF COUNSEL**

In accordance with Rule 210(c), SCACR, the undersigned certifies that the Designation of Matter to be included in the Record on Appeal contains no matter which is irrelevant to the Appeal.

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