

IN 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

Appellate Case No.: 2023-001833
Trial 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**

Respondents MGA Insurance Company, Inc. and Calidad Latina, Inc. proposes the following be included in the Record on Appeal:

1. Complaint, filed March 20, 2019
2. Motion to Amend Summons and Complaint, filed January 28, 2021
3. Memorandum in Opposition to Plaintiff's Motion to Amend, filed March 23, 2021
4. Memo in Support of Motion to Amend Summons and Complaint, filed March 24, 2021
5. Form 4 Order, filed April 1, 2021
6. Amended Complaint, filed September 8, 2021
7. Notice of Motion and Motion to Dismiss, filed November 18, 2022

8. Memorandum in Support of Defendants' Motion to Dismiss Plaintiff's Fraud Cause of Action, filed February 21, 2023
9. Notice of Motion and Motion for Summary Judgment, filed November 28, 2022
10. Memorandum in Support of Defendants' Motion for Summary Judgment, filed February 22, 2023
11. Motion for Partial Summary Judgment, filed February 3, 2023
12. Order, filed March 20, 2023
13. Notice of Motion and Motion for Summary Judgment, filed October 11, 2023
14. Memorandum in Support of Defendants' Motion for Summary Judgment as to Fraud, filed October 20, 2023
15. Form 4 Order, filed October 23, 2023
16. Form 4 Order, filed October 25, 2023
17. Verdict Form, signed October 25, 2023
18. Trial Transcript
19. Plaintiff's Notice of Motion and Motion for 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, filed November 3, 2023
20. Defendant's Memorandum in Opposition to Plaintiff's Motion for J.N.O.V., Motion for New Trial Absolute, and Motion to Alter or Amend Judgment Pursuant to Rules 50, 52, 59, and 60, SCRCP, filed November 8, 2023
21. Plaintiff's Memorandum in Support of her Motion to Alter or Amend Judgment Pursuant to Rule 59, SCRCP, and Motion to Reconsider Pursuant to Rule 52, SCRCP, filed November 3, 2023
22. Form 4 Order, filed November 15, 2023

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

s/Jeanmarie Tankersley
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September 1, 2024