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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Charleston County
Court of Common Pleas

Benjamin H. Culbertson, Circuit Court Judge

Appellate Case No. 2026-001186
Circuit Court Case No. 2024-CP-10-04598

Bettina Honeycutt, Francisco Gilmore, and Jennifer Colburn, individually and
on behalf of all others similarly situated,

Respondents,

v.

Broad River Physicians Group, LLC and Medlytix, LLC,

Appellants.

**APPELLANT MEDLYTIX, LLC'S DESIGNATION OF MATTER TO BE INCLUDED
IN THE RECORD ON APPEAL**

Pursuant to Rule 209, SCACR, Appellant Medlytix, LLC ("Medlytix"), by counsel, hereby
proposes the following be included in the Record on Appeal:

1. Summons & Complaint, dated September 13, 2024.
2. Medlytix's Notice of Filing of Notice of Removal to the United States District Court for the District of South Carolina, dated October 17, 2024.
3. Plaintiffs' Notice of Filing of documents filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH (D.S.C.), dated April 22, 2025.
4. Exhibit E to Plaintiffs' Notice of Filing dated April 22, 2025 – Plaintiffs' Motion to Remand to State Court, and the attachments thereto, filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 6 (D.S.C. Nov. 14, 2024).

5. Exhibit F to Plaintiffs' Notice of Filing dated April 22, 2025 – Medlytix's Motion to Amend Notice of Removal, and the attachments thereto, filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 7 (D.S.C. Nov. 20, 2024).
6. Exhibit G to Plaintiffs' Notice of Filing dated April 22, 2025 – Medlytix's Response in Opposition to Plaintiffs' Motion to Remand to State Court filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 8 (D.S.C. Nov. 21, 2024).
7. Exhibit H to Plaintiffs' Notice of Filing dated April 22, 2025 – Consent Motion for Stay of Deadlines filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 9 (D.S.C. Nov. 22, 2024).
8. Exhibit I to Plaintiffs' Notice of Filing dated April 22, 2025 – Plaintiffs' Reply in Support of Motion to Remand, and the attachments thereto, filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 10 (D.S.C. Dec. 2, 2024).
9. Exhibit J to Plaintiffs' Notice of Filing dated April 22, 2025 – Plaintiffs' Response in Opposition to Medlytix's Motion to Amend Notice of Removal, and the attachments thereto, filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 12 (D.S.C. Dec. 4, 2024).
10. Exhibit K to Plaintiffs' Notice of Filing dated April 22, 2025 – Medlytix's Reply in Support of Motion to Amend Notice of Removal filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 13 (D.S.C. Dec. 11, 2024).
11. Exhibit L to Plaintiffs' Notice of Filing dated April 22, 2025 – Plaintiffs' Notice of Supplemental Authority in Support of Motion to Remand and Opposition to Medlytix's Motion to Amend Notice of Removal, and the attachments thereto, filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 14 (D.S.C. Jan. 31, 2025).
12. Exhibit N to Plaintiffs' Notice of Filing dated April 22, 2025 – Medlytix's Response to Plaintiffs' Notice of Supplemental Authority filed in *Honeycutt v. Broad River Physicians Grp., LLC*, No. 2:24-cv-05922-BHH, ECF No. 17 (D.S.C. Feb. 10, 2025).
13. Order of the United States District Court for the District of South Carolina granting Plaintiffs' Motion to Remand and denying Medlytix's Motion to Amend Notice of Removal, dated April 14, 2025.
14. Broad River's Motion to Compel Individual Arbitration, dated May 5, 2025.
15. Broad River's Memorandum in Support of its Motion to Compel Individual Arbitration, dated May 5, 2025.
16. Medlytix's Motion to Compel Individual Arbitration, dated June 4, 2025.

17. Order granting Medlytix's motion for pro hac vice admission of Bryan A. Fratkin, dated July 30, 2025.
18. Order granting Medlytix's motion for pro hac vice admission of Juliet B. Clark, dated July 30, 2025.
19. Medlytix's Memorandum in Support of Motion to Compel Individual Arbitration, dated July 30, 2025, including Exhibit A (Blue Cross Blue Shield Group Preferred Provider Agreement) and Exhibit B (Blue Cross Blue Shield Individual Health Insurance Exchange ("HIX") Preferred Provider Agreement).
20. Plaintiffs' Response in Opposition to Medlytix's Motion to Compel Individual Arbitration, dated July 30, 2025, including Exhibit 1 (BlueCross BlueShield 2024 BlueEssentials Benefits Policy) and Exhibit 2 (BlueCross BlueShield 2024 Provider Administrative Manual).
21. Plaintiffs' Response in Opposition to Broad River's Motion to Compel Individual Arbitration, dated July 30, 2025, including Exhibit 1 (BlueCross BlueShield 2024 BlueEssentials Benefits Policy) and Exhibit 2 (BlueCross BlueShield 2024 Provider Administrative Manual).
22. Broad River's Reply in Support of its Motion to Compel Individual Arbitration, dated August 4, 2025, including Exhibit A (Blue Cross Blue Shield Group Preferred Provider Agreement); Exhibit B (Blue Cross Blue Shield Individual Health Insurance Exchange ("HIX") Preferred Provider Agreement); Exhibit C (AAA Commercial Arbitration Rules and Mediation Procedures); and Exhibit D (Consent Motion for Stay of Deadlines).
23. Transcript of August 5, 2025 WebEx Motions Hearing.
24. Form 4 Order regarding motions taken under advisement, dated August 11, 2025.
25. Order Denying Medlytix's Motion to Compel Individual Arbitration, dated September 3, 2025.
26. Order Denying Broad River's Motion to Compel Individual Arbitration, dated September 3, 2025.
27. Medlytix's Motion to Alter, Amend, and/or Reconsider Order Denying Motion to Compel Individual Arbitration, dated September 15, 2025.
28. Broad River's Motion to Alter, Amend, and/or Reconsider Order Denying Motion to Compel Individual Arbitration, dated September 15, 2025.

29. Form 4 Order Denying Defendants' Motions to Alter, Amend, and/or Reconsider Orders Denying Defendants' Motions to Dismiss and Motions to Compel Individual Arbitration, dated May 6, 2026.
30. Medlytix's Notice of Appeal, dated May 20, 2026, including proof of service and Notice of Electronic Filing, but excluding copies of the appealed orders separately designated above.
31. Broad River's Notice of Appeal, dated May 20, 2026, including proof of service and Notice of Electronic Filing, but excluding copies of the appealed orders separately designated above.

Pursuant to Rule 209(c), SCACR, I certify that this designation contains no matter which is irrelevant to this appeal.

Respectfully submitted,

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Charlotte, North Carolina
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