

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Richland County
Court of Common Pleas

G. Thomas Cooper, Jr., Circuit Court Judge

Appellate Case No. 2016-000192
Circuit Court Case No. 2014-CP-40-0313

Raymond G. Farmer, as Director of the South Carolina
Department of Insurance,

Petitioner,

v.

CAGC Insurance Company, in Liquidation,

Respondent.

South Carolina Property and Casualty Insurance Guaranty
Association,

Appellant,

v.

CAGC Insurance Company, in Liquidation; Raymond G.
Farmer, in his capacity as Ancillary Receiver of CAGC
Insurance Company, in Liquidation; and CompTrustAGC of
South Carolina a/k/a CompTrustAGC of South Carolina, Inc.,

Respondents.

**DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON
APPEAL BY RESPONDENT COMPTRUSTAGC OF SOUTH CAROLINA
A/K/A COMPTRUSTAGC OF SOUTH CAROLINA, INC.**

Counsel identified on following page

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JUN 21 2016

SC Court of Appeals

YOUNG CLEMENT RIVERS, LLP

Michael A. Molony (SC Bar No. 4026)

T. Douglas Concannon (SC Bar No. 66316)

Russell G. Hines (SC Bar No. 72100)

25 Calhoun Street, Suite 400

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*Attorneys for Respondent CompTrustAGC
of South Carolina a/k/a CompTrustAGC of
South Carolina, Inc.*

Respondent CompTrustAGC of South Carolina a/k/a CompTrustAGC of South Carolina, Inc. proposes the following to be included in the Record on Appeal (to the extent not duplicative):

1. Order Appointing Ancillary Receiver and Commencing Ancillary Proceedings;
2. Order Granting Motion to Intervene and for Joinder of Intervenor-Respondents;
3. North Carolina Court of Appeals Opinion No. COA14-445, filed January 20, 2015;
4. Judgment and Order Granting Motion to Quash Discovery and Motion to Dismiss and Denying Motion for Summary Judgment;
5. Order Denying Intervenor-Petitioner South Carolina Property and Casualty Insurance Guaranty Associations' Motion to Reconsider;
6. Summons and Petition for Appointment of Ancillary Receiver and to Commence Formal Ancillary Proceedings, with Exhibits;
7. Association's Summons and Complaint for Declaratory Judgment, with exhibits;
8. Answer of the Ancillary Receiver to Complaint for Declaratory Judgment of Intervenor-Petitioner South Carolina Property and Casualty Insurance Guaranty Association, filed August 25, 2014;
9. Limited Answer and Affirmative Defenses of Intervenor-Respondent Comptrust AGC of SC, with exhibits, filed March 17, 2015;
10. Transcript of Hearing on June 9, 2014;
11. Transcript of Hearing on September 18, 2015;
12. Motion to Intervene for Joinder of Intervenor-Respondents, and for Declaratory Judgment, with exhibits;

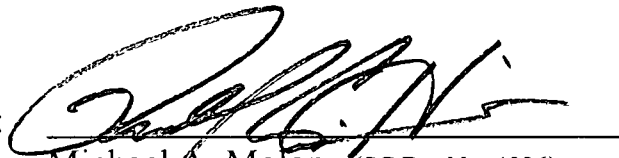
13. Motion to Quash, with exhibits;
14. Documents 2 and 3 Appended to Ancillary Receiver's Memorandum of Law Regarding Motion for Summary Judgment of Intervenor-Petitioner South Carolina Property and Casualty Insurance Guaranty Association, with exhibits, dated September 9, 2015;
15. Notice of Motion and Motion to Dismiss, with exhibits, dated September 9, 2015; and
16. Association's Motion Pursuant to S.C. R. Civ. P. 52(b) and 59(e) Regarding Orders Filed September 30, 2015.

I certify that this Designation of Matters contains no matter which is irrelevant to this appeal.

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



Michael A. Molony (SC Bar No. 4026)

T. Douglas Concannon (SC Bar No. 66316)

Russell G. Hines (SC Bar No. 72100)

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*Attorneys for Respondent CompTrustAGC
of South Carolina a/k/a CompTrustAGC of
South Carolina, Inc.*

Charleston, South Carolina

Dated: 6/17/16

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[counsel named on following page]

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*Attorneys for Respondent CompTrustAGC
of South Carolina a/k/a CompTrustAGC of
South Carolina, Inc.*

I, Russell G. Hines, of Young Clement Rivers, LLP, counsel for Respondent CompTrustAGC of South Carolina a/k/a CompTrustAGC of South Carolina, Inc., do hereby certify that I have served the **DESIGNATION OF MATTERS TO BE INCLUDED IN THE RECORD ON APPEAL BY RESPONDENT COMPTRUSTAGC OF SOUTH CAROLINA A/K/A COMPTRUSTAGC OF SOUTH CAROLINA, INC.** on all other parties to this matter by depositing a copy of the same in the United States Mail, postage prepaid, on June 17, 2016, addressed as follows to their counsel of record:

Howard A. VanDine, III, Esquire
A. Mattison Bogan, Esquire
Erik T. Norton, Esquire
Tara C. Sullivan, Esquire
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Attorneys for Appellant

South Carolina Property and Casualty Insurance Guaranty Association

David W. Boone, Esquire
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P.O. Box 629
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Attorney for Respondent
CAGC Insurance Company, in Liquidation

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P.O. Box 100105
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Attorney for Respondent
Raymond G. Farmer, in his capacity as Ancillary Receiver
Of CAGC Insurance Company, in Liquidation

<SIGNED ON THE FOLLOWING PAGE>

Respectfully submitted,

YOUNG CLEMENT RIVERS, LLP

By:



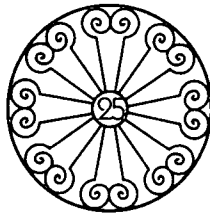
Russell G. Hines (SC Bar No. 72100)

*Attorneys for Respondent CompTrustAGC
of South Carolina a/k/a CompTrustAGC of
South Carolina, Inc.*

Charleston, South Carolina

Dated:

6/17/16



YCR LAW
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Partner

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June 17, 2016

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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SC Court of Appeals

Re: Appellate Case No. 2016-000192
Case No.: 14-CP-40-0313
YCR File: 15140-20130673

Dear Ms. Kitchings:

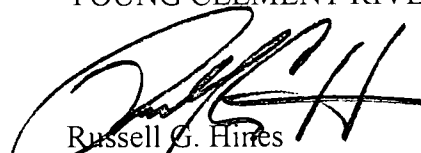
Enclosed for filing in the above-referenced matter, please find the following documents:

- The original and two (2) copies of the Initial Brief of Respondent Comptrustagc of South Carolina a/k/a Comptrustagc of South Carolina, Inc.,
- The original and one (1) copy of Proof of Service of Initial Brief
- The original and two (2) copies of the Designation of Matters to be Included in the Record on Appeal by Respondent Comptrustagc of South Carolina a/k/a Comptrustagc of South Carolina, Inc.
- The original and one (1) copy of Proof of Service of Designation of Matters

Kindly return one clocked copy in the pre-stamped envelope provided. With best wishes and kindest regards, I am

Sincerely,

YOUNG CLEMENT RIVERS, LLP



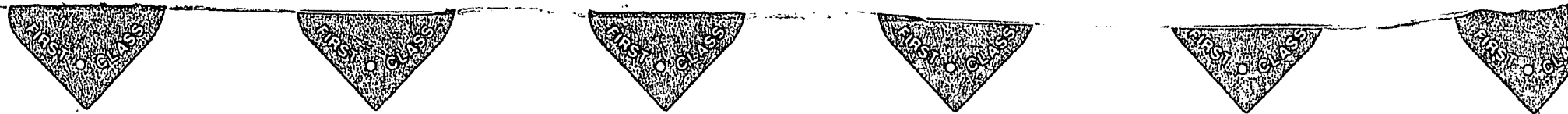
Russell G. Hines
Partner

RGH/amj
Enclosures

cc: Howard A. VanDine, III, Esquire, Nelson Mullins Riley & Scarborough, LLP
A. Mattison Bogan, Nelson Mullins Riley & Scarborough, LLP
Erik T. Norton, Esquire, Nelson Mullins Riley & Scarborough, LLP
Tara C. Sullivan, Nelson Mullins Riley & Scarborough, LLP
David W. Boone, Esquire, NC Department of Justice
Geoffrey R. Bohnam, Esquire, South Carolina Department of Insurance

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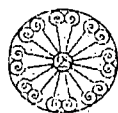
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