

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM COLLETON COUNTY
Court of Common Pleas

Perry M. Buckner, III, Circuit Court Judge

Case No. 2014-CP-15-135

Appellate Case No. 2016-001626

RECEIVED

SEP 14 2016

SC Court of Appeals

Ashley Reeves as Personal Representative for the Estate
of Albert Carl "Bert" Reeves,

Respondent/
Appellant,

v.

South Carolina Municipal Insurance and Risk Financing
Fund,

Appellant/
Respondent.

Appellant/Respondent's Designation of Matter

Pursuant to Rule 209, SCACR, Appellant/Respondent the South Carolina Municipal Insurance and Risk Financing Fund designates the following material for inclusion in the record on appeal. Undersigned counsel certifies, pursuant to Rule 209(c), SCACR, that the designation contains no matter which is irrelevant to the appeal:

ORDERS

1. Order on Summary Judgment Motions, filed June 26, 2016
2. Order denying Parties' Motions to Alter or Amend, filed July 25, 2016
3. Supreme Court Order denying Petition for Original Jurisdiction, filed July 24, 2015

PLEADINGS

4. Complaint, filed February 18, 2014
5. SCMIRF's Answer and Counterclaim, filed May 15, 2014
6. Reeves' Reply to Counterclaim, filed June 11, 2014
7. SCMIRF's Amended Answer and Counterclaim, filed June 19, 2014
8. Reeves' Reply to Amended Answer and Counterclaim, filed June 26, 2014
9. Amended Complaint, filed October 19, 2015

Attachment A – Stipulation of Facts and Issues, dated October 7, 2015

Exhibit 1 – Verdict Form and Judgment in Cottageville Lawsuit

Exhibit 2 – SCMIRF Bylaws

Exhibit 3 – Intergovernmental Agreement for an Insurance and Risk Financing Fund for Risk Sharing Between SCMIRF and Cottageville, dated February 4, 2008

Exhibit 4 – 2011 Coverage Contract between SCMIRF and Cottageville

10. SCMIRF's Answer to Amended Complaint, filed October 30, 2015
11. Complaint in Cottageville Lawsuit (CA# 2:12-02765-DCN), filed August 28, 2012
12. Notice of Removal filed, September 24, 2012
13. Complaint in Craddock Lawsuit (CA# 2:14-01918-DCN), filed May 14, 2014

TRANSCRIPTS

14. Transcript of Summary Judgment Hearing held May 17, 2016

MISCELLANEOUS AND OTHER MOTIONS:

15. Settlement Agreement, dated February 26, 2015
16. Partial Stipulation of Dismissal, filed April 20, 2015

17. Consent Petition for Original Jurisdiction, filed June 3, 2015
18. SCMIRF's Motion for Summary Judgment, filed December 15, 2015
19. SCMIRF's Memorandum in Support of Motion for Summary Judgment, filed December 15, 2015
20. Reeves' Motion for Summary Judgment, filed December 15, 2015
21. Reeves' Memorandum in Support of Motion for Summary Judgment, filed December 15, 2015
22. SCMIRF's Memorandum in Opposition to Reeves' Motion for Summary Judgment, filed January 15, 2016
23. Reeves' Memorandum in Opposition to SCMIRF's Motion for Summary Judgment, filed January 19, 2016
24. Reeves' Supplemental Memorandum in Support of Summary Judgment, filed May 19, 2016
25. Reeves' Proposed Summary Judgment Order, submitted June 14, 2016
26. SCMIRF's Proposed Summary Judgment Order, submitted June 16, 2016
27. SCMIRF's Motion to Alter or Amend, filed July 13, 2016
28. Reeves' Motion to Alter or Amend, filed July 6, 2016
29. Notice of Appeal, filed August 4, 2016

Signature Page Attached

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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September 14, 2016

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PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant South Carolina Municipal Insurance and Risk Financing Fund ("SCMIRF"), do hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified to the following address(es):

Pleadings: **Appellant/Respondent's Designation of Matter**

Counsel Served: **U.S. Mail**
W. Mullins McLeod, Jr., Esquire
Jacqueline LaPan Edgerton, Esquire
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Roxanne E. Daniel
Administrative Assistant

Sept. 14, 2016