

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Charles B. Simmons, Jr., Master-in-Equity

Appellate Case No. 2020-000669
Case No. 2016-CP-23-5905

RECEIVED

Oct 15 2020

SC Court of Appeals

Renewable Water Resources,..... Respondent,

v.

Insurance Reserve Fund, a Division of the
State Fiscal Accountability Authority of South Carolina, Appellant.

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

The Appellant South Carolina Insurance Reserve Fund proposes that the following be included in the Record on Appeal:

- (1) Findings of Fact and Conclusions of Law, filed March 18, 2020,
- (2) Order, filed April 6, 2020
- (3) Order Granting in Part Motion for Costs, filed May 21, 2020.
- (4) Order, filed April 9, 2020
- (5) Order of Reference, filed September 20, 2018
- (6) Amended Complaint, filed June 15, 2018
- (7) Answer to Amended Complaint, filed July 2, 2018

- (8) Notice of Motion and Motion for Judgment as a Matter of Law and/or Involuntary Nonsuit, Motion to Alter or Amend Judgment and/or Motion for Reconsideration, And Motion for New Trial, filed March 30, 2020 (with attachments)
- (9) Emails filed March 30, 2020
- (10) Plaintiff's Pre-Trial Brief
- (11) Defendant's Pre-Trial Brief
- (12) Trial Transcript, January 28-30, 2020, pp. 1-738
- (13) All designated and submitted pages and exhibits from Rule 30(b)(6) Deposition of Renewable Water Resources
- (14) Plaintiff's Exhibits 2, 4, 6, 8, 9, 14, 15, 30, 32, 38, 91, 94, 99, 100 and 101
- (15) Defendant's Exhibits 8, 9, 10, 12, 13, 16, 19, 20, 23, and 27
- (16) Transcript of Motion Hearing, May 13, 2020, p. 1
- (17) Plaintiff's Proposed Findings of Fact and Conclusions of Law
- (18) Defendant's Proposed Findings of Fact and Conclusions of Law

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

LINDEMANN & DAVIS, P.A.

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-and-

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Insurance Reserve Fund*

October 15, 2020

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CERTIFICATE OF SERVICE

Pursuant to Section (g)(3) of the Supreme Court's Order Re: Operation of the Trial Courts During the Coronavirus Emergency (as amended May 29, 2020), the undersigned employee of Lindemann & Davis, P.A., counsel for the Appellant, does hereby certify that service of the **Initial Brief of Appellant** and **Appellant's Designation of Matter to be Included in the Record on Appeal** was made upon all counsel of record by email only this the 15th day of October 2020:

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s/ Andrew F. Lindemann



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October 15, 2020

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SC Court of Appeals

Via Email Only

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Email: ctappfilings@sccourts.org

RE: Renewable Water Resources v. Insurance Reserve Fund, a Division of the State Fiscal
Accountability Authority of South Carolina
Appellate Case Number: 2020-000669
Civil Action Number: 2016-CP-23-5905
Claim Number: A4190
Our File Number: 104.10068

Dear Ms. Kitching:

In accordance with Section (c)(5) of the Supreme Court's Order RE: Operation of the Appellate Courts During the Coronavirus Emergency (As Amended May 29, 2020), please find enclosed for filing the **Initial Brief of Appellant** and **Appellant's Designation of Matter to be Included in the Record on Appeal** in the above referenced matter. In accordance with Section (g)(3) of this same order, I am hereby serving copies on all counsel of record by email only. If you have any questions, please advise.

Sincerely,

LINDEMANN & DAVIS, P.A.

Andrew F. Lindemann

AFL/jmb
Enclosures

cc: Rivers S. Stilwell, Esquire (*w/ Enclosures, Via Email Only*)
William S. Brown, V, Esquire (*w/ Enclosures, Via Email Only*)
Katie E. Towery, Esquire (*w/ Enclosures, Via Email Only*)
John R. Devlin, Jr., Esquire (*w/ Enclosures, Via Email Only*)