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**May 31 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

L. Casey Manning, Circuit Court Judge

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Case No. 2020-CP-40-05802

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

Respondents

v.

Jessica K. Altman, as Rehabilitator of Senior  
Health Insurance Company of Pennsylvania,  
Patrick H. Cantilo, as Special Deputy  
Rehabilitator of Senior Health Insurance  
Company of Pennsylvania, and Senior Health  
Insurance Company of Pennsylvania in  
Rehabilitation

Appellants

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DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

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Denise L. Bessellieu  
**COZEN O'CONNOR**  
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(704) 348-3455

May 31, 2022

Appellants propose the following be included in the Record on Appeal:

1. Summons and Complaint filed December 10, 2020.
2. Defendants-SHIP Rehabilitation Appellants' Motion to Dismiss and supporting documents filed August 23, 2021.
3. Defendants-SHIP Rehabilitation Appellants' Motion to Supplement and supporting documents filed September 15, 2021.
4. Plaintiffs-SCDOI Appellees' Motion for Temporary Injunction and supporting documents filed November 12, 2021.
5. Plaintiffs-SCDOI Appellees' Motion for Temporary Restraining Order and supporting documents filed November 18, 2021.
6. Court order dated November 19, 2021 entering temporary restraining order.
7. Court order dated November 29, 2021 rescheduling hearing.
8. Amended Notice of Hearing dated December 3, 2021.
9. Transcript of Proceedings occurring on December 15, 2021.
10. Order dated December 15, 2021 regarding proposed orders.
11. Preliminary injunction order dated January 20, 2022.
12. Notice of Appeal filed February 22, 2022.
13. Order dated March 10, 2022 substituting parties.
14. Order dated April 15, 2022 regarding Defendants-SHIP Rehabilitation Appellants' Motion to Dismiss.

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

May 31, 2022

/s/ Denise L. Bessellieu

**COZEN O'CONNOR**

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/s/ Michael J. Broadbent

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*Counsel for Defendants-SHIP  
Rehabilitation Appellants Michael  
Humphreys, Acting Insurance  
Commissioner of the Commonwealth of  
Pennsylvania, as Statutory Rehabilitator  
for Senior Health Insurance Company of  
Pennsylvania, Patrick H. Cantilo, as  
Special Deputy Rehabilitator of Senior  
Health Insurance Company of  
Pennsylvania, and Senior Health  
Insurance Company of Pennsylvania*

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Appellants

PROOF OF SERVICE OF DESIGNATION OF MATTER TO BE  
INCLUDED IN THE RECORD ON APPEAL

Appellants, Michael Humphreys (Acting Insurance Commissioner of Pennsylvania and successor to former Commissioner Jessica K. Altman), as Rehabilitator of Senior Health Insurance Company of Pennsylvania; Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania; and Senior Health Insurance Company of Pennsylvania in Rehabilitation by and through counsel, here certify that a true and correct copy of the foregoing Designation of Matter to be Included in the Record of Appeal has been served

on Respondents, via electronic mail on the 31st day of May, 2022 (Delivery receipts attached hereto as Exhibit “A”) as follows:

As to Respondents’ Counsel of Record:

(Via Electronic Mail (Delivered: 5/31/2022))

Geoffrey R. Bonham, Esquire  
Associate General Counsel  
South Carolina Department of Insurance  
1201 Main Street, Suite 1000  
Columbia, SC 29201  
Telephone: (803) 737-6219  
Email: gbonham@doc.sc.gov

s/Denise L Bessellieu  
Denise L Bessellieu  
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Attorneys for Appellant

# **EXHIBIT A**

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**From:** Scott, Candice  
**Sent:** Tuesday, May 31, 2022 7:40 PM  
**To:** 'Geoffrey Bonham'  
**Cc:** Bessellieu, Denise; Broadbent, Michael  
**Subject:** Farmer v. Humphreys - Appellants' Initial Brief and Designation of Matter  
**Attachments:** Appellants' Initial Brief.pdf; Designation of Matter to be Included in the Record of Appeal.pdf

Dear Mr. Bonham,

Attached for service, please find Appellants' Initial Brief and Designation of Matter. Thank you.



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