

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

98063

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JAN 27 2023

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
DeAndrea G. Benjamin, Circuit Court Judge

Appellate Case No. 2022-001469

South Carolina Public Interest Foundation and Joe E. Taylor, Jr., individually,  
and on behalf of all others similarly situated, ..... Respondents,

v.

Richland County and Richland County Council, ..... Appellants.

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**MOTION TO SUBSTITUTE RESPONDENT**

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**NOW COMES** the Respondent South Carolina Public Interest Foundation and moves this Court to substitute John Crangle as a Respondent in the place of Joe E. Taylor, Jr.

In support of this Motion, the Respondent would show the Court that Mr. Taylor died recently. John Crangle is a citizen, resident, taxpayer, and registered elector of Richland County, South Carolina, and he has consented to serve in this capacity.

The undersigned counsel has consulted with counsel for the Appellants, and counsel for the Appellants has no objection to this Motion.

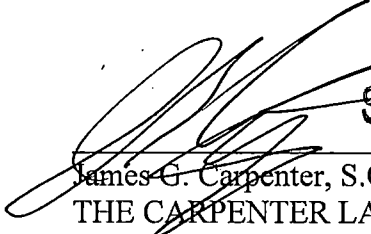
**WHEREFORE**, Respondent South Carolina Public Interest Foundation prays this Court to substitute John Crangle as a Respondent in the place of the late Joe E. Taylor, Jr.

Respectfully submitted

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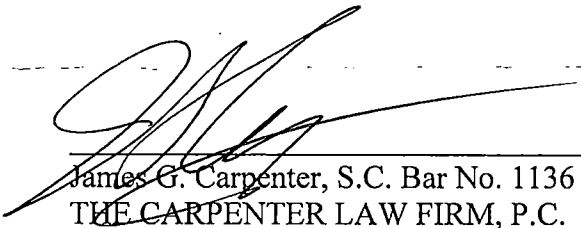
  
James G. Carpenter, S.C. Bar No. 1136  
THE CARPENTER LAW FIRM, PC  
819 E. North Street  
Greenville, South Carolina 29601  
(864) 235-1269  
Attorney for Respondents

January 24, 2023

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that he has served a copy of the foregoing Motion to Substitute Respondent on counsel for Appellants by US Mail, postage prepaid on Tuesday, January 24, 2023 addressed as follows:

Andrew F. Lindemann  
PO Box 6923  
Columbia, SC 29260

  
James G. Carpenter, S.C. Bar No. 1136  
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Attorney for Respondents



WHEN IT'S WORTH FIGHTING FOR

JAMES G. CARPENTER  
james.carpenter@carpenterlawfirm.net  
SERVING S.C. AND N.C.

January 24, 2023

The Honorable Jenny Abbott Kitchings  
Clerk of SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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JAN 27 2023  
SC Court of Appeals

Re: **MOTION TO SUBSTITUTE RESPONDENT**

*South Carolina Public Interest Foundation and Joe E. Taylor, Jr., individually, and on behalf of all others similarly situated v. Richland County and Richland County Council*  
Appellate Case No. 2022-001469

Dear Ms. Kitchings:

I enclose Respondents' Motion to Substitute Respondent, a Certificate of Service, and a check for the filing fee.

If you need anything else, please telephone me.

Sincerely yours,  
THE CARPENTER LAW FIRM, PC

James G. Carpenter

Enclosures

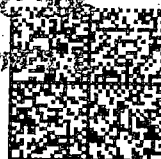
CC w/enclosures: Andrew Lindemann



THE CARPENTER LAW FIRM, P.C.  
819 EAST NORTH STREET GREENVILLE, SC 29601

GREENVILLE SC 296

25 JAN 2023 PM



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SC Court of Appeals

The Honorable Jenny Abbott Kitchens  
Clerk of SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

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