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Nov 25 2024

SC Court of Appeals

In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Chief Administrative Law Judge

Appellate Case No.: 2024-000013

Administrative Law Court Case No. 19-ALJ-17-0416-CC

Tractor Supply Company,..... Appellant,

v.

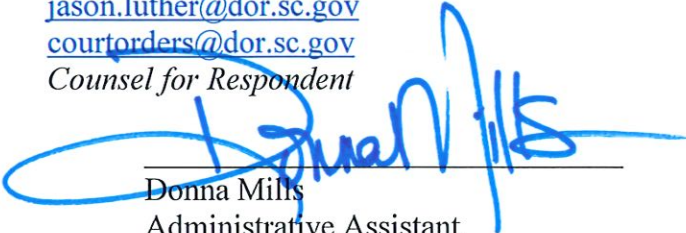
South Carolina Department of Revenue, Respondent.

PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley & Scarborough LLP, attorneys for Appellant, hereby certify that I have served all counsel in this action with a copy of the pleading(s) hereinbelow specified, pursuant to the Supreme Court Order 2022-05-06-04:

Pleadings: Final Opening Brief of Appellant Tractor Supply Company
Final Reply Brief of Appellant Tractor Supply Company

Counsel Served: Via E-Mail
Marcus D. Antley, Esq.
W. Allen Myrick, Esq.
Jason P. Luther, Esq.
South Carolina Department of Revenue
300A Outlet Pointe Blvd.
Columbia, SC 29210
marcus.antley@dor.sc.gov
allen.myrick@dor.sc.gov
jason.luther@dor.sc.gov
courtorders@dor.sc.gov
Counsel for Respondent


Donna Mills
Administrative Assistant

November 25, 2024

Donna Mills

From: Donna Mills
Sent: Monday, November 25, 2024 12:51 PM
To: 'marcus.antley@dor.sc.gov'; 'allen.myrick@dor.sc.gov'; Jason.Luther@dor.sc.gov
Cc: Mitch Brown; Bryson Geer; John Von Lehe; Bobby Streisel; Eileen Hindman
Subject: Tractor Supply Company v. SCDOR - Appellate Case No. 2024-000013
Attachments: 2024.11.25 TSC - F-L re TSC's Final Opening Brief, Final Reply Brief, and Record on Appeal.pdf; 2024.11.25 TSC - Appellant's Final Opening Brief.pdf; 2024.11.25 TSC - Appellant's Final Reply Brief.pdf; 2024.11.25 TSC - (POS) Appellant's Final Briefs.pdf

Good afternoon,

Attached for service upon you in the above matter is Appellant Tractor Supply Company's Final Opening Brief and Appellant Tractor Supply Company's Final Reply Brief as well as a Proof of Service regarding the same.

We will be filing these briefs as well as the Record on Appeal (which was previously served upon you) later today and will copy you on those emails as well.

Thank you,



DONNA MILLS **ADMINISTRATIVE ASSISTANT**
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November 25, 2024

Via Electronic Filing via Email and Hand Delivery

The Honorable Jenny Abbott Kitchings
SC Court of Appeals
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
Nov 25 2024
SC Court of Appeals

RE: Tractor Supply Company v. South Carolina Department of Revenue
Appellate Case No.: 2024-000013
Administrative Law Court Case No. 19-ALJ-17-0416-CC
NMRS File No. 045685/01500

Dear Ms. Kitchings:

Please find attached for filing in this matter the following documents as well as a proof of service regarding the first two items (the last item was previously served on the Department):

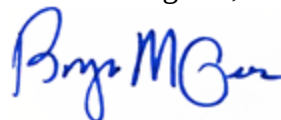
- (1) Appellant Tractor Supply Company's Final Opening Brief;
- (2) Appellant Tractor Supply Company's Final Reply Brief; and
- (3) Record on Appeal, Volumes I-XI

In addition, as requested in your letter in the above matter dated August 6, 2024, we will hand-deliver one bound copy of each of the aforementioned documents as well as one DVD that contains certain exhibits in native format that are identified in the Record on Appeal.

By copy of this letter to counsel of record, we are serving them with a copy of this letter.

Thank you for your assistance.

With kind regards,



Bryson M. Geer

BMG:dfm
Enclosures

cc: Marcus D. Antley, III, Esq.
W. Allen Myrick, Esq.
Jason P. Luther, Esq. (*Via Email Only – Without Enclosures*)

The Honorable Jenny Abbott Kitchings

October 10, 2019

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