

STATE OF SOUTH CAROLINA  
DEPARTMENT OF REVENUE  
OFFICE OF GENERAL COUNSEL

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Mar 03 2025

SC Court of Appeals

300A Outlet Pointe Blvd.  
Columbia, SC 29210



Main Line: 803.898.5130  
Facsimile: 803.896.0171

March 3, 2025

**VIA ELECTRONIC MAIL to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)**

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

**Re: U.S. Bank National Association v. South Carolina Department of Revenue  
Appellate Case No. 2024-001577**

Dear Ms. Kitchings:

Respondent South Carolina Department of Revenue respectfully requests a 30-day extension of its deadline to file its initial brief and designation of matter in the above referenced matter. Counsel for U.S. Bank National Association consents to its request. The current due date for these filings is March 10, 2025. By our calculations, with a 30-day extension, they would be due Wednesday, April 9, 2025. This is South Carolina Department of Revenue's first request for an extension.

With kind regards, I am

Sincerely,

A handwritten signature in blue ink that reads "Marcus D. Antley, III".

Marcus D. Antley, III

MDA/jdg

c: Bryson M. Geer, Esquire  
Craig B. Fields, Esquire  
Nicole L. Johnson, Esquire

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**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM THE S.C. ADMINISTRATIVE LAW COURT

Honorable Milton G. Kimpson, Administrative Law Judge  
Honorable Robert L. Reibold, Administrative Law Judge (on Reconsideration)

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Appellate Case No. 2024-001577  
Administrative Law Court Case No. 20-ALJ-17-0168-CC

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U.S. Bank National Association.....Appellant,

v.

South Carolina Department of Revenue.....Respondent.

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**PROOF OF SERVICE**

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I, the undersigned Paralegal with the South Carolina Department of Revenue, attorneys for the Respondent, hereby certify that I have served all counsel listed below with a copy of the letter dated March 3, 2025 to the SC Court of Appeals via electronic mail:

Bryson M. Geer  
Nelson Mullins Riley & Scarborough LLP  
151 Meeting Street/Sixth Floor  
PO Box 1806  
Charleston, SC 29401-2230  
bryson.geer@nelsonmullins.com

Craig B. Fields (Admitted *pro hac vice*)  
Nicole L. Johnson (Admitted *pro hac vice*)  
Blank Rome LLP  
1271 Avenue of the Americans  
New York, NY 10020  
[craig.fields@blankrome.com](mailto:craig.fields@blankrome.com)  
[Nicole.johnson@blankrome.com](mailto:Nicole.johnson@blankrome.com)

***Counsel for Appellant***

  
Jennifer D. Gamble  
*Senior Paralegal*

March 3, 2025

**From:** [Jennifer Gamble](#)  
**To:** [Bryson Geer](#); [craig.fields@blankrome.com](mailto:craig.fields@blankrome.com); [Nicole.johnson@blankrome.com](mailto:Nicole.johnson@blankrome.com)  
**Cc:** [Marcus "Trey" Antley, III](#); [Jason Luther](#)  
**Subject:** U.S. Bank National Association v SC Department of Revenue (2024-001577)  
**Date:** Monday, March 3, 2025 2:26:00 PM  
**Attachments:** [2025.03.03 Clerk letter requesting extension.pdf](#)

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Good Afternoon:

Please find attached and served upon you SC Department of Revenue's March 3, 2025 letter to the court requesting an extension to file it's Initial Brief and Designation of Matter in the above referenced case.

Thank you,  
Jennifer