

THE STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

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APPEAL FROM SALUDA COUNTY
COURT OF COMMON PLEAS

S.C. Supreme Court

WILLIAM P. KEESLEY, CIRCUIT COURT JUDGE

Case No. 2008-CP-41-0004
Appellate Case No. 2012-212790

Dennis N. Lambries Respondent,

v.

Saluda County Council;
T. Hardee Horne, Chairman;
William "Billie Pugh, Councilman;
Steve Teer, Councilman;
Jacob Schumpert, Councilman; and
James Frank Daniel, Sr., Councilman Petitioners

SOUTH CAROLINA ASSOCIATION OF COUNTIES
NOTICE OF MOTION AND
MOTION FOR LEAVE TO FILE AN
AMICUS CURIAE BRIEF

Robert E. Lyon, Jr., General Counsel
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Attorneys for *Amicus Curiae*

Pursuant to Rule 213 of the South Carolina Appellate Court Rules, the South Carolina Association of Counties (the Association) respectfully submits this Motion for Leave to File a Brief of *Amicus Curiae* on behalf of Saluda County.

I. INTEREST OF *AMICUS CURIAE*

The Association is an instrumentality of the forty-six (46) Counties of the State of South Carolina. Act No. 1383, 1968 Acts at 3193. The Association represents the collective interests of all forty-six (46) South Carolina Counties, so that they may speak with one voice. The case before this Court will affect the interests of all forty-six (46) counties in matters pertaining to their ability to conduct regular meetings in an efficient and effective manner. The Association's interest in this case is to provide the Court with the collective insights of all the Counties of the State pertaining to the issues in this matter.

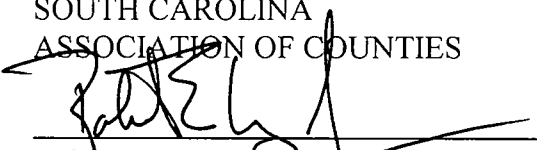
II. DESIRABILITY OF BRIEF OF *AMICUS CURIAE*

By allowing the Association to file an *Amicus Curiae* brief, the Court will preclude the need for numerous individual counties to request leave to file individual *Amicus Curiae* briefs. The participation of the Association will provide the Supreme Court with the insight and thoughts of the Association and the counties which will be directly affected by the Court's decision. The proposed Brief of *Amicus Curiae* will present arguments in support of Saluda County.

WHEREFORE, Counsel for the Association of Counties prays this Court enter its Order permitting the Association leave to file its *Amicus Curiae* brief.

Respectfully submitted,

SOUTH CAROLINA
ASSOCIATION OF COUNTIES



Robert E. Lyon, Jr., General Counsel
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Dated: April 28, 2014

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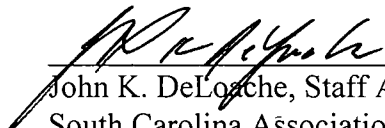
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CERTIFICATE OF SERVICE

I certify that I have this 28 day of April, 2014, mailed a copy of the South Carolina Association of Counties' Amicus Curiae Brief to the following via U.S. Mail with sufficient postage thereto to the below listed attorneys.


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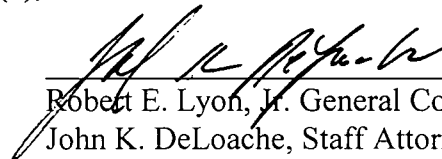
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CERTIFICATE OF COUNSEL

The South Carolina Association of Counties' counsel hereby certify that the Brief of *Amicus Curiae* complies with SCACR Rules 208(b), 211 and 312.


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