

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM ADMINISTRATIVE LAW COURT

DEBORAH BROOKS DURDEN, ADMINISTRATIVE LAW JUDGE

73052

Docket No. 13-ALJ-17-0104-CC

William J. Montgomery,.....Respondent,

v.

Spartanburg County Assessor,.....Appellant.

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

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SC Court of Appeals

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 Spartanburg 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 the uniform and equitable process for valuation of certain real property classified and assessed as agricultural use. 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 Court of Appeals 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 Spartanburg 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

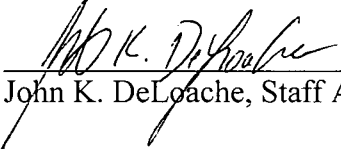


Robert E. Lyon Jr., General Counsel
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July 31, 2014

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above Notice of Motion and Motion for Leave to File an Amicus Curiae Brief was mailed this 31st day of July, 2014 via United States Postal Service, First Class Postage Prepaid, to the following counsel of record:



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