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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas  
The Honorable R. Keith Kelly, Circuit Court Judge

**RECEIVED**  
JUL 29 2015  
SC Court of Appeals

Appellate Case No. 2015-001141

Laura Jane Edwards . . . . . Respondent,

v.

State of South Carolina . . . . . Appellant.

**RETURN TO MOTION TO INTERVENE**

The State of South Carolina, through its undersigned attorney, respectfully submits this Return to the South Carolina Department of Motor Vehicles' ("the Department") Motion to Intervene.

The Department submitted its Motion to Intervene dated July 13, 2015. The State of South Carolina has reviewed the motion. The Department moved to intervene in this matter, and also asked the Court to remand this case to the Circuit Court. For the sake of brevity, the State

will not repeat the reasoning offered by the Department in its Motion to Intervene.

The State agrees with the Department's requests and motions in the Motion to Intervene. The State respectfully asks the Court to grant the Department's Motion to Intervene, and also to remand the case to Circuit Court.

Respectfully submitted,



Daniel H.H. Cude, Assistant Solicitor  
Seventh Judicial Circuit Solicitor's Office  
Spartanburg County Courthouse  
180 Magnolia Street  
Spartanburg, South Carolina 29306  
Phone: (864)596-2575  
Fax: (864)596-2386  
Counsel for the Appellant State of S.C.

July 27, 2015  
Spartanburg, South Carolina

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v.  
State of South Carolina . . . . . Appellant.


**PROOF OF SERVICE**

I HEREBY CERTIFY that on July 27, 2015, I mailed, via first class mail, postage prepaid, a true and correct copy of the foregoing **Return to Motion to Intervene** to:

J. Patricia Anderson, Esquire  
Post Office Box 1507  
Spartanburg, South Carolina 29304

W. Barry Bland, Esquire  
Post Office Box 6432  
Spartanburg, South Carolina 29304

Frank L. Valenta, Jr., Esquire  
General Counsel, South Carolina Department of Motor Vehicles  
Post Office Box 1498  
Blythewood, South Carolina 29016-0020

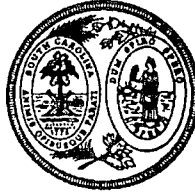
  
\_\_\_\_\_  
Renee Poole, Paralegal  
Seventh Judicial Circuit Solicitor's Office

July 27, 2015  
Spartanburg, South Carolina

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# State of South Carolina

Spartanburg County Court House  
180 Magnolia Street  
Spartanburg, S.C. 29306  
Phone (864) 596-2575  
Fax (864) 596-2386



Cherokee County Court House  
Floyd Baker Blvd.  
Gaffney, S.C. 29340  
Phone (864) 487-2576  
Fax (864) 487-2753

BARRY J. BARNETTE  
*Solicitor, Seventh Judicial Circuit*

RECEIVED

July 27, 2015

JUL 29 2015

SC Court of Appeals

V. Claire Allen  
Deputy Clerk  
The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, S.C. 29211

RE: The State v. Laura J. Edwards  
Appellate Case No. 2015-001141

Dear Madame Clerk:

Please find enclosed the original and six copies of the State of South Carolina's Return to Motion to Intervene. Please also find enclosed the Proof of Service in this matter. I have served the parties with a copy of this Return. If I can be of further assistance, please contact me at (864) 596-2575.

Sincerely,

A handwritten signature in cursive script that reads "Renee Poole".

Renee Poole  
Paralegal  
Seventh Circuit Solicitor's Office

Cc: J. Patricia Anderson, Esquire  
W. Barry Bland, Esquire  
Frank L. Valenta, Esquire

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**BARRY J. BARNETTE**  
SOLICITOR, 7TH JUDICIAL CIRCUIT  
SPARTANBURG COUNTY COURTHOUSE  
SPARTANBURG, SOUTH CAROLINA 29306

THE HONORABLE V. CLAIRE ALLEN  
DEPUTY CLERK  
SOUTH CAROLINA COURT OF APPEALS  
P.O. BOX 11629  
COLUMBIA, SC 29211

**RECEIVED**

JUL 29 2015

SC Court of Appeals