

THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals

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SC Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

HONORABLE RALPH KING ANDERSON, III, CHIEF ADMINISTRATIVE LAW  
JUDGE

CASE NO. 14-ALJ-17-0158-CC  
Appellant Case No. 2015-001509

DIRECTV, INC. & SUBSIDIARIES .....Appellant

v.

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

**SECOND MOTION FOR EXTENSION OF TIME TO FILE RESPONDENT'S  
INITIAL BRIEF AND DESIGNATION OF MATTER**

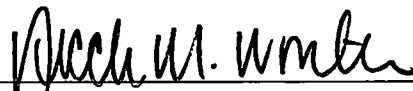
Pursuant to Rules 208(a)(1), 209, 240 and 263 of the South Carolina Appellate Court rules, Respondent, South Carolina Department of Revenue, respectfully requests a seven day extension of time to file its Initial Brief and Designation of Matter in the above-captioned matter. This is the second request for an extension of this deadline.

This request is necessitated because counsels' schedule and other case demands and scheduling deadlines will not allow them to complete the Respondent's Initial Brief and Designation of Matter within the current deadline. Counsel for Appellant does not object to this request.

The Respondent's Initial Brief and Designation are currently due on December 9, 2015. With the additional seven day extension, Respondent's Initial Brief and Designation will be due on December 16, 2015.

Therefore, Respondent respectfully moves this Court for a seven day extension of time to file its Initial Brief of Respondent and Designation of Matter in this matter until December 16, 2015.

Respectfully submitted,



Nicole M. Wooten (Bar No. 73594)  
Counsel for Litigation  
William J. Condon, Jr. (Bar No. 12632)  
Counsel for Litigation  
Mary Beth Campbell (Bar No. 100025)  
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[Nicole.Wooten@dor.sc.gov](mailto:Nicole.Wooten@dor.sc.gov)

December 4, 2015  
Columbia, South Carolina

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In The Court Of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

HONORABLE RALPH KING ANDERSON, III, CHIEF ADMINISTRATIVE LAW  
JUDGE

CASE NO. 14-ALJ-17-0158-CC  
Appellant Case No. 2015-001509


DIRECTV, INC. & SUBSIDIARIES,.....Appellant

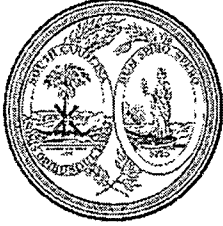
v.

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

PROOF OF SERVICE

I, Cindy S. Bailey, do hereby certify that I have caused to be mailed postage pre-paid, a copy of the Department's Second Motion for Extension of Time to File Respondent's Initial Brief and Designation of Matter in re: DIRECTV, Inc. and its Subsidiaries v. South Carolina Department of Revenue, Appellant Case No. 2015-001509 to John C. von Lehe, Esquire, and Bryson M. Geer, Esquire, Nelson Mullins Riley & Scarborough LLP, 151 Meeting Street, Sixth Floor, Charleston SC 29401-2239, R. Gregory Roberts, Esquire, Morrison & Foerster, LLP, 250 West 55<sup>th</sup> Street, New York, NY 10019-9601, Thomas H. Steele, Esquire and Andres Vallejo, Esquire, Morrison & Foerster, LLP, 425 Market Street, San Francisco, CA, 94105-2482 this 4<sup>th</sup> day of December 2015.

  
Cindy S. Bailey



STATE OF SOUTH CAROLINA  
DEPARTMENT OF REVENUE

300A Outlet Pointe Blvd., Columbia, South Carolina 29210  
P.O. Box 12265, Columbia, South Carolina 29211-9979

December 4, 2015

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

Re: DIRECTV, Inc. & Subsidiaries v. South Carolina Department of Revenue  
Appellate Case No. 2015-001509  
ALC Docket No. 14-ALJ-17-0185-CC

Dear Ms. Kitchings:

Enclosed please find the original and six copies of Respondent's Second Motion for Extension of Time to File Initial Brief and Designation of Matter in the above-referenced matter.

By copy of this letter, we are serving this Second Motion for Extension of Time on counsel for Appellant DIRECTV, Inc. & Subsidiaries. Respondent has informed Appellant of its intent to file this motion, but at the time of this filing, Appellant has neither objected nor consented to this extension.

Yours truly,

OFFICE OF GENERAL COUNSEL FOR LITIGATION

A handwritten signature in black ink that reads "Nicole M. Wooten".

Nicole M. Wooten  
Counsel for Litigation  
803-898-1826  
[Nicole.Wooten@dor.sc.gov](mailto:Nicole.Wooten@dor.sc.gov)

Enclosure