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SC Court of Appeals

THE STATE OF SOUTH CAROLINA  
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.

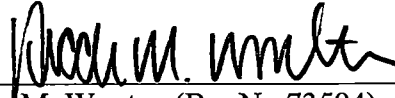
**Respondent's Motion to Allow Timothy C. Thompson to Withdraw as Counsel of  
Record**

Pursuant to Rule 264(b) of the South Carolina Appellate Court Rules,  
Respondent, South Carolina Department of Revenue, files this Motion to Allow Timothy  
C. Thompson to Withdraw as Counsel of Record.

This request is necessitated because Timothy C. Thompson recently accepted  
employment with another organization and no longer represents the Respondent in this  
matter. Respondent has been represented from the outset of this appeal by Nicole M.  
Wooten, William J. Condon, Jr., Mary Beth Campbell, and Milton Kimpson, and they  
will continue representing Respondent. The withdrawal of Mr. Thompson will not  
impact representation of Respondent, prejudice either party in any matter, or delay this  
appeal.

Respondent respectfully requests that Timothy C. Thompson be allowed to withdraw from representation, and that he be removed from all notices, letters, and other communications in this appeal.

Respectfully submitted,



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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)  
Counsel for Litigation  
Milton G. Kimpson (Bar No. 7917)  
General Counsel for Litigation  
P.O. Box 12265  
Columbia, SC 29211-9979  
Attorneys for Respondent  
South Carolina Department of Revenue  
(803) 898-1826  
(803) 896-0171  
[Nicole.Wooten@dor.sc.gov](mailto:Nicole.Wooten@dor.sc.gov)  
[CourtOrders@dor.sc.gov](mailto:CourtOrders@dor.sc.gov)

January 11, 2016  
Columbia, South Carolina

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

v.

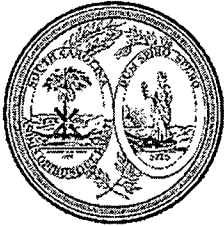
South Carolina Department of Revenue.....Respondent.

PROOF OF SERVICE

I, Tonie M. Miranda, do hereby certify that I have caused to be mailed postage pre-paid, a copy of the Department's Motion to Allow Timothy C. Thompson to Withdraw as Counsel of Record 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 11<sup>th</sup> day of January 2016.



Tonie M. Miranda



STATE OF SOUTH CAROLINA  
DEPARTMENT OF REVENUE

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

January 11, 2016

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SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: DIRECTV, Inc. & SUBSIDIARIES (Appellant) vs. South Carolina  
Department of Revenue (Respondent)  
Case Number: 14-ALJ-17-0158-CC  
Appellant Case Number: 2015-001509

Dear Ms. Kitchings:

Enclosed for filing is a Motion to Allow Timothy C. Thompson to Withdraw as Counsel of Record on behalf of Respondent in the above case. Also enclosed is a Proof of Service on the Appellant.

Should you have any questions, please do not hesitate to contact me at 803-898-1826 or [Nicole.Wooten@dor.sc.gov](mailto:Nicole.Wooten@dor.sc.gov).

Sincerely,

OFFICE OF GENERAL COUNSEL FOR LITIGATION

A handwritten signature in black ink, appearing to read "Nicole M. Wooten".

Nicole M. Wooten  
Counsel for Litigation

c: John C. von Lehe, Esquire  
Bryson M. Geer, Esquire  
R. Gregory Roberts, Esquire  
Thomas H. Steele, Esquire  
Andres Vallejo, Esquire

Enclosures  
NMW: tm



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Columbia, South Carolina 29211-9979

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THE HONORABLE JENNY ABBOTT KITCHINGS  
CLERK OF COURT  
SOUTH CAROLINA COURT OF APPEALS  
PO BOX 11629  
COLUMBIA SC 29211

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