

# HODGE & LANGLEY LAW FIRM, P.C.

*Attorneys at Law*

229 MAGNOLIA STREET, P.O. BOX 2765

*Spartanburg, SC 29304-2765*

TEL. (864) 585-3873

FAX (864) 585-6485

CHARLES J. HODGE

E-MAIL: [hodgecharles@hotmail.com](mailto:hodgecharles@hotmail.com)

NBTA CERTIFIED CIVIL TRIAL SPECIALIST

T. RYAN LANGLEY

E-MAIL: [RLangley@hodgelawfirm.com](mailto:RLangley@hodgelawfirm.com)

LICENSED IN SOUTH CAROLINA AND GEORGIA

January 23, 2017

***Via U.S. Mail and Facsimile***

Honorable Daniel E. Shearouse  
Supreme Court of South Carolina  
P.O. Box 11330  
Columbia SC 29211  
Fax: (803) 734-1499

**RE: *Carolina Convenience Stores, Inc., Harry Lancaster Jr., as Power of Attorney for Harry Lancaster Sr., and Willard Oil Company, Inc, v. City of Spartanburg, SC***

**Case No.: 2007-CP-42-09988R**

**Appellate Case No.: 2012-212473**

Dear Mr. Shearouse:

Pursuant to South Carolina Appellate Court Rule 208(b)(7) please accept this letter as notice that Petitioner will reference the following authority that has come to its attention after the initial briefs were served and filed: *Arkansas Game and Fish Com'n v. U.S.*, 133 S.Ct. 511 (2012).

The reason for the supplemental citation is to support Petitioner's argument that the majority opinion erred by providing law enforcement a categorical, blanket exemption to Takings Clause inspection instead of evaluating carefully the relevant factors and circumstances of the case as required by law.

Yours very truly,



T. Ryan Langley

cc: David L. Morrison – *via email and U.S. mail*

7453 Irmo Dr., Suite B

Columbia, SC 29212

email: [David@DMorrison-law.com](mailto:David@DMorrison-law.com)

**RECEIVED**

JAN 25 2017

S.C. SUPREME COURT

**HODGE & LANGLEY LAW FIRM, P.C.**

*Attorneys at Law*

229 MAGNOLIA STREET

P.O. Box 2765

*Spartanburg, South Carolina 29304-2765*

GREENVILLE

SC 296

23 JAN '17

PM 3 1



UNITED STATES POSTAGE  
  
PITNEY BOWES  
02 1P \$ 000.46<sup>0</sup>  
0001957735 JAN 23 2017  
MAILED FROM ZIP CODE 29306

Honorable Daniel E. Shearouse  
Supreme Court of South Carolina  
P.O. Box 11330  
Columbia SC 29211

29211-133030

