

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAR 23 2018

APPEAL FROM THE ADMINISTRATIVE LAW COURT
Deborah Brooks Durden, Administrative Law Judge

SC Court of Appeals

Case No. 13-ALJ-17-0523-CC
Appellate Case No. 2017-01548

Greenville Hospital SystemAppellant,

v.

South Carolina Department of RevenueRespondent.

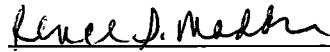
Respondent’s Motion to Allow Renee I. Madden to Withdraw as Counsel of Record

Pursuant to Rule 264(b) of the South Carolina Appellate Court Rules, Respondent South Carolina Department of Revenue, files this Motion to Allow Renee I. Madden to Withdraw as Counsel of record.

This request is necessitated because Renee I. Madden will be leaving the Department of Revenue and so informed the Department on March 21, 2018. Respondent has been represented from the outset of this appeal by Jason P. Luther and he will continue to represent Respondent in this matter. The withdrawal of Ms. Madden will not impact representation of Respondent, prejudice either party in any matter, or delay this appeal.

Respondent respectfully requests that Renee I. Madden be allowed to withdraw from representation, and that she be removed from all notices, letters, and other communications in this appeal.

Respectfully submitted,



Renee I. Madden (Bar No. 101552)

Counsel for Litigation

Jason P. Luther (Bar No. 78021)

General Counsel for Litigation

P.O. Box 12265

Columbia, SC 29211

Attorneys for Respondent

South Carolina Department of Revenue

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Attorneys for Respondent

South Carolina Department of Revenue

Columbia, SC
March 23, 2018

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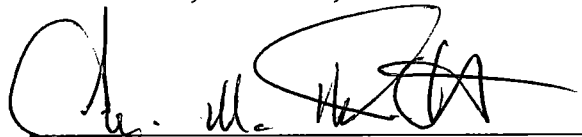
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PROOF OF SERVICE

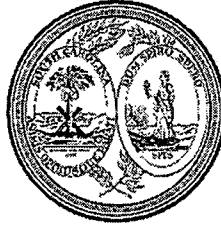
I, Tonie M. Miranda, hereby certify that I have caused to be mailed a copy of the South Carolina Department of Revenue’s Motion for Leave to File Amended Initial Brief of Respondent, Amended Initial Brief of Respondent, and Respondent’s Motion to Allow Renee I. Madden to Withdraw as Counsel of Record regarding the above-referenced case, by depositing the same in the United States Mail, postage prepaid, on March 23, 2018, addressed to the attorneys of record, Arthur F. McLean, III, Esquire, Frank W. Cureton, Esquire, and Charles M. Sprinkle, III, Esquire, Haynsworth Sinkler Boyd, P.A., One North Main Street, Second Floor, Greenville, SC 29601, and by hand delivery to the Court of Appeals, 1220 Senate Street, Columbia, SC 29201.



Tonie M. Miranda
Legal Assistant, Office of General Counsel
South Carolina Department of Revenue

STATE OF SOUTH CAROLINA
DEPARTMENT OF REVENUE
OFFICE OF THE GENERAL COUNSEL

Physical Address:
300A Outlet Pointe Blvd.
Columbia, SC 29210



Mailing Address:
PO Box 12265
Columbia, SC 29211-9979

March 23, 2018

VIA HAND DELIVERY

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

Re: Greenville Hospital System v. South Carolina Department of Revenue
Appellate Case No. 2017-01548
ALC Docket No. 13-ALJ-17-0523-CC

Dear Ms. Kitchings:

Enclosed for filing is a Motion to Allow Renee I. Madden 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 Jason Luther at 803-898-5759 or Jason.Luther@dor.sc.gov.

Very truly yours,

OFFICE OF GENERAL COUNSEL FOR LITIGATION

Renee I. Madden

Renee I. Madden
Counsel for Litigation

c: Arthur F. McLean, III, Esquire
Frank W. Cureton, Esquire
Charles M. Sprinkle, III, Esquire
Enclosure

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