

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Deborah Brooks Durden, Administrative Law Judge

Case No.: 13-ALJ-17-0523-CC

Appellate Case No.: 2017-01548

**RECEIVED**

MAR 29 2018

SC Court of Appeals

Greenville Hospital System .....Appellant,

v.

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

**PROOF OF SERVICE**

I certify that I have served the *Brief of Appellant and Reply Brief of Appellant* in the above-captioned matter on counsel for Respondent South Carolina Department of Revenue by depositing a copy of the *Brief of Appellant and Reply Brief of Appellant* in the United States Mail, postage prepaid, on March 26, 2018, addressed to their attorneys of record as follows:

Renee Madden, Esq.  
Jason P. Luther, Esq.  
Patrick McCabe, Esq.  
South Carolina Department of Revenue  
Office of General Counsel for Litigation  
P.O. Box 12265  
Columbia, South Carolina 29211



March 26, 2018

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**CERTIFICATE OF COUNSEL**

The undersigned certifies that this Final Brief of Appellant complies with Rule 211(b),  
SCACR.



Arthur F. McLean, III, S.C. Bar No. 11794  
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Greenville Hospital System*

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The undersigned certifies that this Final Reply Brief of Appellant complies with Rule 211(b), SCACR.



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March 26, 2018

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The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

RE: *Greenville Hospital System, Appellant, v. South Carolina Department of Revenue, Respondent*, Administrative Law Court Case No. 13-ALJ-17-0523-CC  
**Appellate Case No. 2017-01548**

Dear Ms. Kitchings:

Please find enclosed for filing fifteen copies of the Brief of Appellant and Reply Brief of Appellant, the originals of which are unbound, together with our Certificates of Counsel and Proof of Service. I have enclosed one additional bound copy of the Brief of Appellant and Reply Brief of Appellant, Certificate of Counsel and Proof of Service for filing and returning to me as file-stamped copies in the enclosed self-addressed stamped envelope provided for your convenience.

By copy of this letter, I am serving one copy of the Brief of Appellant and Reply Brief of Appellant upon counsel for Respondent, South Carolina Department of Revenue.

Please feel free to contact me should you have any questions or concerns.

Sincerely,

HAYNSWORTH SINKLER BOYD, P.A.



Charles M. Sprinkle  
Attorney for Appellant

CMS/mlw  
Enclosure

cc: Jason P. Luther, Esq.  
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