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THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

JUN 10 2016

SC Court of Appeals

APPEAL FROM GREENVILLE COUNTY COURT OF COMMON PLEAS

HONORABLE CHARLES B. SIMMONS, CIRCUIT COURT JUDGE

CASE NO. 2012-CP-23-04064
Appellant Case No. 2015-001909

Piedmont Natural Gas Company, Inc.....Appellant,

v.

Richeous Smith, Worthly Smith a/k/a Worley Smith, Pearl Terry, Ethel Butler, Tweety Smith a/k/a Tweety Smith Harris, Doreth Smith, Fletcher Lee Harris, Alma Williams Smith, James R. Smith, Loree Smith, Gene A. Smith, Adolf Smith, Janie Sue Smith, Samuel Paul Smith, Ruby Smith Mansell, Buford Mansell, Ethel Mae Smith, Wilson Smith, Patrick R. Smith, Reginald Lamont Smith, Eric Smith, Christine Smith Dawkins, William G. Dawkins, Alma Renee Smith Murry, Sharai Smith Brock, Robert Lee Smith, Melissa F. Smith, Rosalyn Annette Steven, Edith Smith Foster, George Waymon Foster, Bridgette Smith Blassingame, Tara Smith, Waymon Odell Smith, Martha Miller Smith, Calvin Lee Smith, Reece W. Smith, Raymond Eddie Smith, Michael Smith, Odell Smith, Dorothy Smith Pearson, Gary Pearson, Jerome Smith, Jaygo Terry, Ida Terry, Mack Terry, Zone Terry, Leola Terry Smith, James Smith, J.P. Terry, David Brayvell Terry, Ettie Pearl Booker, Tecora O. Terry Mason, Odell Mason, Lenora Holley, Dorothy Terry Sheppard, Orangelee Sheppard, Vernon Sheppard, Kasandra Sheppard Jenkins, Karen Sheppard Spates, Theodore Terry, Sr., Gracie Terry, Kelvin F. Terry, Theodore Terry, Jr., Keith Terry, Leola Terry Daniels, Wilford Daniels, Terrance Leslie, Sr., Derrick McGee, Jr., Fred Smith, Jr., Mannell Terry, Patricia Terry, Sheila Terry, Barbara Evans, Leonard Evans, Linda Evans, Thomas Evans, Johnny R. Williams, Connie Evans, Michael Evans, Iola Terry Cox, William Henry Cox, Johnny F. Cox, Joyce A. Smith, Anthony Cox, Alfred Cox, J. Henry Cox, Charlette J. Cox, Charles J. Cox, Michael Cox, Supearl Terry Gilliam a/k/a Supearl Terry Gilliam Miranda, Eugene Gilliam, Terry Gilliam, Jerry Gilliam, Warren Gilliam, Eugene Gilliam, Jr., Melvin Gilliam, Rodney Gilliam, Cindy Gilliam, Shakima Gilliam, Carmella Cottom, Nina Gilliam, Vermell Gilliam Phillips, Shaynise Alston, John Gilliam, Donald Gilliam, Sr., Leunette Gilliam, Donnette Gilliam

Ortchere, Leslie Gilliam Peter, Angela Gilliam, Donald E. Gilliam, Raymond T. Gilliam, Juan Miranda, Carmen Miranda a/k/a Carmen Miranda Glavin, John Glavin, Sr., John Glavin, Jr., Miranda Glavin, Jeffrey Glavin, Yolanda Glavin, Ezell Terry, Magaline Terry, Leroy Terry, Kenneth Terry, James (Jimmy) Terry, Pearlle Mae Terry, Winnie L. Terry Anderson, Furman Anderson, Tommy Anderson, Abigail Dodd, Angela Reid, Sandra McDowell, Harold Anderson, Mary Ann Davis, Charlene Peake, Albert Anderson, Paul Terry, Betty Jo Terry, Donald E. Terry, Deloris I. Terry, Paul A. Terry, Mark G. Terry, Terry Sholer, Jamie Terry, James O.C. Smith, Pauline Smith, Gloria Gore, Paul Smith, Ethel Allen, Desiree Golden, Pauline Workman, Brenda Moulhem, and if any of the aforementioned be deceased; then their heirs, successors, devisees, distributees, Administrators, Executors and Personal Representatives, and any party claiming by or through them, Landowners,

and

The United States of America, acting by and through its agency, the Internal Revenue Service, The United States of America, acting by and through its agency the United States Department of Justice, The South Carolina Department of Revenue, The South Carolina Department of Mental Health, The State of South Carolina, Bullhead Investments, LLC, Arrow Financial Services, LLC, Sharonview Federal Credit Union, Discover Bank, Zachery Arnold, GE Commercial Finance Business Property Corporation, Midland Funding, LLC, and Greenville County, Other Condemnees,

and

John Doe and Mary Roe, being fictitious names used to represent all persons and condemnees whose true names are not known, including the heirs, successors, devisees, distributees, Administrators, Executors and Personal Representatives of any of the abovenamed Landowners and Other Condemnee who may be deceased; and also all Condemnees whose names are not known, including heirs, infants, persons under disability and persons who may be in Military service, who claim, or may claim, an interest in the property being condemned, and also all other persons unknown, claiming any right, title, estate, interest in or lien upon the real estate described in the Condemnation Notice and Tender of Payment herein, said property being identified as a portion of Greenville County Tax Map Numbers 053101010200 and 0531010102101, Unknown Claimants,

Of whom Ethel Allen, Shaynise Alson, Harold Anderson, Tommy Anderson, Bridgette Smith Blassingame, Sharai Smith Brock, Carmepa Cottom, Alfred Cox, Mary Ann Davis, William G. Dawkins, Abigail Dodd, Linda Evans, Michael Evans, Thomas Evans, Chavonte Gilliam, Cindy Gilliam, Derrick Gilliam, Donald E. Gilliam, Jr., John L. Gilliam, Lakisha Gilliam, Latonya Gilliam, Leunette Gilliam,

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and

Unknown landowners, Reece W. Smith, Raymond Eddie Smith, Michael Smith, Odell Smith, United States of America and the United States of America, acting by and through its Agency, the Internal Revenue Service, Midland Funding, LLC, Sharonview Federal Credit Union, SC Department of Revenue, County of Greenville, Arrow Financial Services, LLC, SC Dept. of Mental Health, SC Attorney General, and Bullhead Investments, LLC, Zachery Arnold, Ettie Pearl Booker, Ira K. Carol, Johnny F. Cox, Wilford Daniels, Angela Gilliam, Bianca S. Gilliam, Demetrius J. Gilliam, Jerry Gilliam, Kehiminnie S. Gilliam, Terry Gilliam, John Glavin, Jr., John Glavin, Sr. Jeffrey Glavin, Miranda Glavin, Yolanda Glavin, Terrance Leslie, Terrell Leslie, Tearia Leslie, Donnette Ortchere, Jerome Smith, Melissa F. Smith, Michael Smith, James (Jimmy) Terry, Patricia Terry, Pearlie Mae Terry, and Sheila Terry..... Respondents.

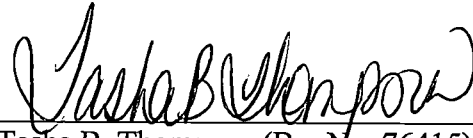
**Respondent’s Motion to Allow Mary Elizabeth Bolt Campbell to Withdraw as
Counsel of Record**

Pursuant to Rule 264(b) of the South Carolina Appellate Court Rules, Respondent, South Carolina Department of Revenue, files this Motion to Allow Mary Elizabeth Bolt Campbell to Withdraw as Counsel of Record.

This request is necessitated because Mary Elizabeth Bolt Campbell recently accepted employment with another organization and no longer represents the Respondent in this matter. The withdrawal of Mrs. Campbell will not impact representation of Respondent, prejudice either party in any matter, or delay this appeal.

Respondent respectfully requests that Mary Elizabeth Bolt Campbell be allowed to withdraw from representation, and that she be removed from all notices, letters, and other communications in this appeal.

Respectfully submitted,



Tasha B. Thompson (Bar No. 76415)
Counsel for Litigation
Sean G. Ryan (Bar No. 76585)
Managing Counsel for Litigation
Milton G. Kimpson (Bar No. 7917)
General Counsel for Litigation
Post Office Box 12265
Columbia, South Carolina 29211-9979
Phone: (803) 898-5248
Fax: (803) 896-0171
Attorney for S.C. Department of Revenue
tasha.thompson@dor.sc.gov
courtorders@dor.sc.gov

Columbia, South Carolina
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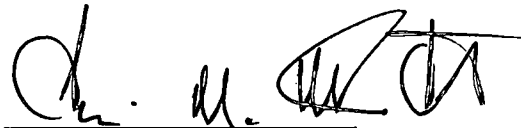
SC Court of Appeals

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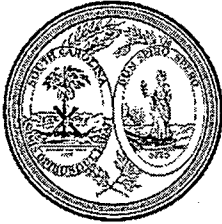
I, Tonie M. Miranda, do hereby certify that I have caused to be mailed postage pre-paid, a copy of the Department's Notice of Appearance to Add Counsel of Record and Motion for Leave to Withdraw in re: Piedmont Natural Gas Company, Inc. vs. Richeous Smith, et al., Appellate Case No. 2015-001909, to Mr. Kevin A. Dunlap, Esquire, 100 Dunbar St., Ste. 206, Spartanburg SC 29306-5187, Mr. Alan Lance Crick, Esquire, 55 Beattie Place, Ste. 700, Greenville SC 29601, Mr. Wylie Westmoreland Clarkson, Esquire, PO Box 287, Columbia SC 29202, Mr. Charles Nathaniel Griffin,

III, Esquire, PO Box 19766, Raleigh NC 27619, Mr. Jeffrey D. Wile, Esquire, 301 University Ridge, Ste. 2400, Greenville SC 29601-3681, Mr. David B. Ward, Esquire, 307 Pettigru Street, Greenville SC 29601, Ms. Erin Culbertson, Esquire, 114 Manly St., Greenville SC 29601, Richard L. Jackson, Esquire, 101 South Edgeworth Street, Suite 300, Greensboro NC 27401, Ms. Kelley Yarborough Woody, Esquire, PO Box 6432, Columbia SC 29260, Mr. Trace M. Dillon, Esquire, 2346 Wisteria Drive, Suite 220, Snellville GA 30078, Mr. Ahmad Shariyf Washington, Esquire, 4212 Poplar Grove Drive, Charlotte NC 28269, Mr. Paul Andrew McKee, III, Esquire, PO Box 2196, 409 Magnolia Street, Spartanburg SC 29304-2196, South Carolina Department of Mental Health, c/o John Magill, 2414 Bull Street, Columbia SC 29202, Discover Bank, c/o CT Corporation, 2 Office Park Court Ste. 103, Columbia SC 29223, GE Commercial Finance Business Property Corporation, c/o CT Corporation, 2 Office Park Court, Ste. 103, Columbia SC 29223, Jerome Smith, 232 Sunnyglen Dr., Greer SC 29651, Ettie Pearl Booker, 21 Cotswold Terrace, Taylors SC 29687, Wilford Daniels, 144 Sweet Ave., Buffalo NY 14212, Terrance Leslie, Jr., 204 Herman St., Buffalo NY 14211, Terrell Leslie, Sr., 204 Herman St., Buffalo NY 14211, Teaira Leslie, 204 Herman St., Buffalo NY 14211, Terry Gilliam, 47 Myers St., Buffalo NY 14211, Jerry Gilliam, 5 Myers St., Buffalo NY 14211, Ira K. Carol, 1348 Cochran Crossing, McDonough GA 30252, Demetrius J. Gilliam, 4328 Thyme Ave., Las Vegas NV 89910, Kehiminnie S. Gilliam, 4328 Thyme Ave., Las Vegas NV 89910, Bianca S. Gilliam, 4328 Thyme Ave., Las Vegas NV 89910, Donnette Gilliam Ortchere, 444 Emslie Street, Buffalo NY 14212, Angela Gilliam, 445 Emslie St., Buffalo NY 14212, John Glavin, Sr., 21 Murray Terrace, Tonawanda NY 14150, John Glavin, Jr., 196 Moore St., Tonawanda NY

14150, Miranda Glavin, 21 Murray Terrace, Tonawanda NY 14150, Jeffrey Glavin, 21
Murray Terrace, Tonawanda NY 14150, Yolanda Glavin, 21 Murray Terrace,
Tonawanda NY 14150, James (Jimmy) Terry, 105 Bailey Rd., Greer SC 29651, Pearlle
Mae Terry, PO Box 6942, Greenville SC 29606, and Zachery Arnold, 460 Durham
Rd., Greer SC 29650 on this 9th day of June, 2016.

A handwritten signature in black ink, appearing to read 'Tonie M. Miranda', with a horizontal line underneath the signature.

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

June 9, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street-5th Floor
Columbia, SC 29201

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SC Court of Appeals

Re: Piedmont Natural Gas Company, Inc. vs. Richeous Smith, et al.
Appellate Case No. 2015-001909

Dear Ms. Kitchings:

Please find enclosed the South Carolina Department of Revenue's Notice of Appearance to Add Counsel of Record and Motion for Leave to Withdraw regarding the above-referenced matter, along with Proof of Service.

Should you have any questions, please do not hesitate to contact me at 803-898-5248 or Tasha.Thompson@dor.sc.gov.

Sincerely,

OFFICE OF GENERAL COUNSEL FOR LITIGATION

A handwritten signature in cursive script that reads "Tasha B. Thompson".

Tasha B. Thompson
Counsel for Litigation

c:

Kevin A. Dunlap, Esquire
Alan L. Crick, Esquire
Wylie W. Clarkson, Esquire
Charles N. Griffin, III, Esquire
Jeffrey Wile, Esquire
David Ward, Esquire
Erin Culbertson, Esquire
Richard Jackson, Esquire
Kelley Y. Woody, Esquire
Trace Dillon, Esquire

Ahmad S. Washington, Esquire
Paul A. McKee, III, Esquire
SC Department of Mental Health, c/o John Magill
Discover Bank, c/o CT Corporation
GE Commercial Finance Business Property Corp., c/o CT Corporation
Jerome Smith
Ettie P. Booker
Wilford Daniels
Terrance Leslie, Jr.
Terrance Leslie, Sr.
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Pearlie M. Terry
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Enclosures
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THE HONORABLE JENNY ABBOTT KITCHINGS
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