

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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FEB 22 2017

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

G. Thomas Cooper, Circuit Court Judge

Case No. 2016-CP-40-3102  
Appellate Case No. 2016-001839

Richland County, South Carolina, ..... Appellant/Respondent,

v.

The South Carolina Department of Revenue,  
and Rick Reames, III in his Official capacity  
as its Director ..... Respondents/Appellants,

v.

Richland PDT, a joint venture consisting  
of M.B. Kahn Construction Co., Inc.,  
ICA Engineering, Inc., And Brownstone  
Construction Group, LLC, as a unit and individually, ..... Third-Party Defendants.

**DESIGNATION OF MATTER  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondents/Appellants propose the following be included in the Record on Appeal:

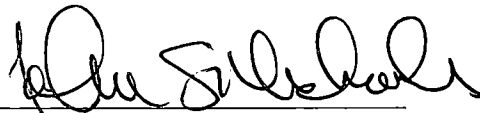
1. Exhibits to Memorandum in Opposition to Plaintiff's Declaratory Judgment, Writ of Mandamus and Motion for Temporary Injunction.

I certify that this designation contains no matter which is irrelevant to this appeal.

/Signature page attached

February 22, 2017

Respectfully submitted, "



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Attorneys for Respondents-Appellants

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G. Thomas Cooper, Jr., Circuit Court Judge

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Case No. 2016-CP-40-3102

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Richland County, South Carolina ..... Appellant/Respondent,

Central Midlands Regional Transit Authority, ..... Intervenor/Respondent,

v.

The South Carolina Department of Revenue,  
Rick Reames, III, in his official capacity as its Director, ..... Respondents/Appellants,

v.

Richland PDT, a joint venture consisting of  
M.B. Kahn Construction Co. Inc., ICA Engineering,  
Inc., and Brownstone Construction Group, LLC, as a  
unit and Individually ..... Third-Party Defendants.

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**PROOF OF SERVICE**

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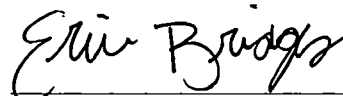
The undersigned hereby certifies that on the date indicated below she served  
counsel with a copy of the *Motion for the Court to Accept the Initial Brief of Appellant of  
Respondents-Appellants Out of Time* and the conditionally filed *Initial Brief of Appellant  
of Respondents-Appellants and Designation of Matter to be Included in the Record on  
Appeal* by mailing copies of the same by United States Mail with first class postage  
prepaid to the following addresses:

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Erin Bridges

February 22, 2017



BLUESTEIN · NICHOLS · THOMPSON · DELGADO LLC  
ATTORNEYS AT LAW

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SC Court of Appeals

**VIA HAND DELIVERY**

The Honorable Jenny Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

Re: Richland County v. SC Dept. of Revenue  
Case Tracking No. 2016-001839

Dear Ms. Kitchings:

Please find enclosed for filing the original and seven (7) copies of a Motion for the Court to Accept the Initial Brief of Appellant of Respondents/Appellants and Designation of Matter to be Included in the Record on Appeal Out of Time. Also, please find enclosed the conditionally filed original and one (1) copy of the Initial Brief of Appellant of Respondents/Appellants and Designation of Matter to be Included in the Record on Appeal in regards to this matter. I have also enclosed a Proof of Service upon counsel for the Appellant/Respondent. Please return the additional filed copy to me via our courier.

Thank you for your attention to this matter. If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,

Erin Bridges  
Paralegal to John S. Nichols  
BLUESTEIN, NICHOLS,  
THOMPSON & DELGADO, LLC

/emb

Enclosures

cc: James E. Smith, Jr.

Milton G. Kimpson  
Andrew F. Lindemann  
Benjamin E. Nicholson, V  
Ray N. Stevens  
Robert E. Tyson, Jr.