

THE STATE OF SOUTH CAROLINA
In The Supreme Court

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S.C. SUPREME COURT

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas
The Honorable R. Markley Dennis, Jr.

Appellate Case No. 2017-000297
Lower Court Case No. 2011-CP-08-02814

Todd Olds..... Petitioner,

v.

City of Goose Creek..... Respondent.

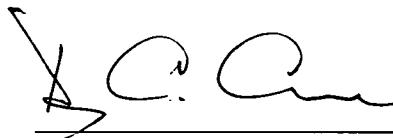
**REPLY TO PETITIONER'S RETURN TO
MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF**

Petitioner's Return to the Municipal Association's Motion unleashes an unseemly broadside that is unworthy of presentation to this Court. In the course of twelve pages, Petitioner accuses the Municipal Association of, among other things, misrepresentation (pages 1 and 11), "sharp practice" (page 9), a "misleading" description of its own organization (page 3), wasting judicial resources (page 1), having "a direct financial benefit" in the controversy (page 4), seeking its own financial gain (pages 4-5), threatening the separation of powers (pages 1 and 4), and an effort "to lobby this Court the same way it lobbied the General Assembly" (page 7) for a "political decision on a legal issue" (page 6). Petitioner, displeased with the message delivered by the Amicus Brief, attacks the messenger.

Despite the slings and arrows of Petitioner's criticisms, as well as Petitioner's unabashed forays outside the Record and his interpretation of communications with certain Municipal Association employees, the Municipal Association does not support Petitioner's asserted view of the definition of "gross income" for purposes of the municipal business license tax. The position of the Municipal Association on this issue is as set out to this Court in its Amicus Brief.

As sought by its Motion of April 26, the Municipal Association respectfully requests that this Court grant it leave to appear as Amicus and accept the Amicus Brief previously conditionally filed and served with its Motion.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Crowe', is written over a horizontal line. The signature is stylized and cursive.

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May 8, 2018

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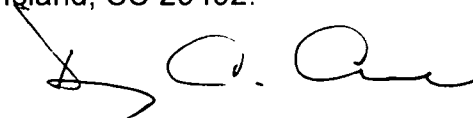
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PROOF OF SERVICE

I certify that I have served the Reply to Petitioner's Return to Motion for Leave to File Amicus Curiae Brief by causing a copy of it to be deposited in the United States Mail, postage prepaid, on May 8, 2018, addressed to the attorneys of record, Thomas R. Goldstein, P.O. Box 71121, North Charleston, SC 29415, and Timothy A. Domin, 126 Seven Farms Drive, Suite 200, Daniel Island, SC 29492.



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