

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Honorable S. Phillip Lenski, Administrative Law Judge

Case No. 16-ALJ-17-0221-CC
Case No. 17-ALJ-17-0113-CC
Appellate Case No. 2017-002568

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MAY 23 2018
SC Court of Appeals


South Carolina Department of RevenueAppellant,

v.

Bi-Lo, LLC, d/b/a Bi-Lo #5612Respondent.

PROOF OF SERVICE

I, Zoe C. Sanders, hereby certify that I have caused to be mailed a copy of the Respondent's Initial Brief in the above-referenced case, by depositing the same in the United States Mail, postage prepaid, to Elizabeth W. Shields, P.O. Box 12265, Columbia, S.C. 29211-9979, on this 23rd day of May 2018.



Zoe C. Sanders

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South Carolina Department of RevenueAppellant,

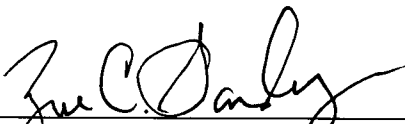
v.

Bi-Lo, LLC, d/b/a Bi-Lo #5612Respondent.

CERTIFICATE OF COUNSEL

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

May 23rd, 2018



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MAY 23, 2018

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BY HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1220 Senate St.
Columbia, S.C. 29201

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RE: SC DOR v. Bi-Lo LLC
Appellate Case No. 2017-002568

Dear Ms. Kitchings:

Enclosed for filing are one original of Respondent's Final Brief and 16 copies. One copy to be clocked and returned to Respondent.

Also enclosed for filing is a Proof of Service which certifies that Respondent's Final Brief has been served on every other party to this appeal in accord with 211(a), SCACR and certification that Rule 211(b) has been complied with.

Thank you,



Zoe C. Sanders
The Sanders Law Firm of South Carolina LLC

cc: Elisabeth W. Shields