

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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OCT - 8 2018

S.C. SUPREME COURT

APPEAL FROM DORCHESTER COUNTY
Edgar W. Dickson, Circuit Court Judge

Case No. 2018-000395

Gerard E. Ziegler; Brenda Barrington III; James Stephen Green, Jr.; William A. Harbeson; David Messinger; South Carolina Public Interest Foundation; and Dorchester County Taxpayers Association, individually, and on behalf of all others similarly situated,..... Appellants,

v.

Dorchester County; Dorchester County Council; Charles D. Chinnis, George H. Bailey, Sr., Jay Byars, Willie R. Davis, Carroll S. Duncan, Larry Hargett and William R. Hearn, Jr., in their official capacities as members of Dorchester County Council, Respondents.

**MOTION OF EDWARD D. SLOAN, JR.
FOR LEAVE TO PARTICIPATE AS AMICUS CURAE**

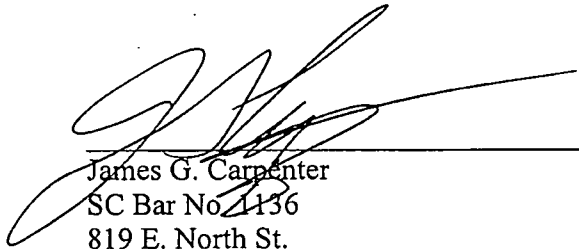
Mr. Edward D. Sloan, Jr. ("Sloan") is the founder and former president and chairman of the board of the South Carolina Public Interest Foundation ("SCPIF"). SCPIF is a South Carolina corporation, not for profit, and dedicated to the public interest, including the proper enforcement of the South Carolina Constitution and statutes. Sloan and SCPIF have filed more than 100 taxpayer or public interest cases in the last 20+ years, nearly always represented by the undersigned counsel. In nearly all these cases Sloan and SCPIF have claimed taxpayer standing and/or public importance standing.

Recently, this Court requested briefing on "whether this case involves a justiciable controversy." This Amicus learned of the Court's request and moves the Court for leave:

1. leave to file the accompanying Amicus brief to address the Court's question of justiciability, including both taxpayer and public importance standing, and
2. leave to address the Court in oral argument, either solely on behalf of the Amicus, or jointly on behalf of the Amicus and the Appellants, one of which is the South Carolina Public Interest Foundation.

The request for the undersigned counsel to participate in oral argument originated with Counsel of record for the Appellants.

THE CARPENTER LAW FIRM, P.C.



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Attorney for Amicus Edward D. Sloan, Jr.

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PROOF OF SERVICE

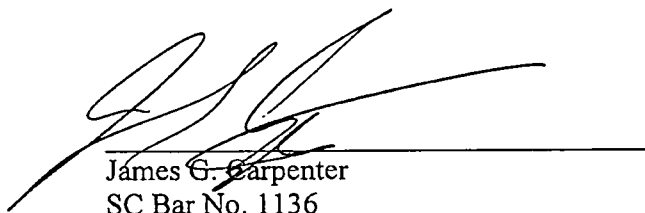
The undersigned attorney hereby certifies that he served a copy of the motion of Edward D. Sloan Jr. for leave to file an amicus brief, with a copy of the proposed brief, this October 9, 2018, by first class mail, postage prepaid, addressed as follows:

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