

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

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**RECEIVED**

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

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OCT 12 2018

**S.C. SUPREME COURT**

Case No. 2018-000395

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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.

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**MOTION OF EDWARD D. SLOAN, JR.  
FOR LEAVE TO FILE AMICUS BRIEF**

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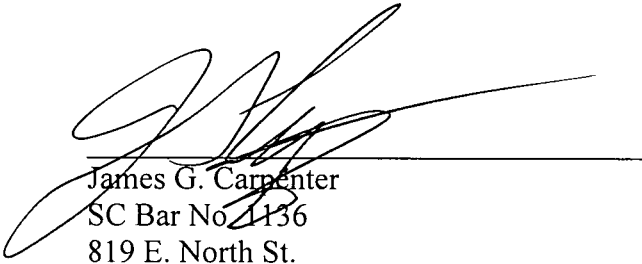
Mr. Edward D. Sloan, Jr. ("Sloan") is the founder and former president and chairman of the board of the South Carolina Public Interest Foundation ("SCPIF"). SCPIF is a South Carolina corporation not for profit, dedicated to the public interest, including the proper enforcement of the South Carolina Constitution 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:

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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Tel. (864) 235-1269  
Attorney for Amicus Edward D. Sloan, Jr.

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**PROOF OF SERVICE**

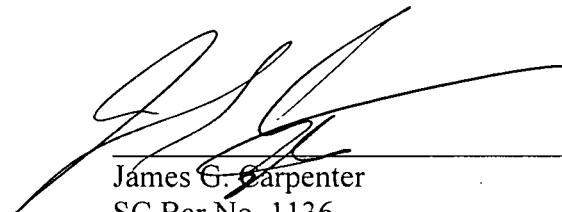
The undersigned attorney hereby certifies that he served a copy of the motion of Edward D. Sloan Jr. for leave to file an amicus brief, with a copy of the proposed brief, this October 9, 2018, by first class mail, postage prepaid, addressed as follows:

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