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JAN 10 2020

S.C. SUPREME COURT

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January 10, 2020

**HAND DELIVERY AND ELECTRONIC MESSAGE**

The Honorable Daniel E. Shearouse  
Clerk of Court, Supreme Court of South Carolina  
1231 Gervais Street  
Columbia, South Carolina 29201

RE: Petitioner Century Capital Group, LLC v. Respondents Midtown Development Group, LLC, Richland Joint Venture Group, LLC, Windsor Richland Mall, L.P., and BRC Richland, LLC  
Supreme Court of South Carolina Case No.: 2018-001874

Dear Mr. Shearouse:

My name is Jon Asbill. I am the attorney representing Richland Joint Venture Group, LLC, in the above-referenced case. Oral argument in this case is scheduled to be heard before the Supreme Court at 10:30 A.M. on Tuesday, January 14, 2020. Although there are multiple Respondents in this matter and a single brief was filed on behalf of all of the Respondents, not all of the arguments located within the Respondents' Brief are common to each of the Respondents. In particular, my client (Richland Joint Venture Group, LLC) has an "Acceptance of Patent Defects" argument specific to itself and its relation to the Petitioner, and Respondent Windsor Richland Mall, L.P., has a "Statute of Repose" argument that is specific to itself and its relation to Petitioner. I spoke to a representative of the Supreme Court earlier this week about the best way to handle this dilemma in terms of structuring our oral argument before the Supreme Court and I was informed that I should send you a formal letter setting forth a proposed time allocation for the arguments on behalf of the Respondents. After communicating with counsel for the Respondents, we are hereby submitting this joint letter to the Supreme Court requesting that the last five (5) minutes of our oral argument section for the Respondents be reserved for these two specific arguments that are only applicable to two of the Respondents. If the Supreme Court prefers a different method for splitting these arguments and addressing this issue, we are certainly amenable to any suggestions or directives from the Supreme Court.

Sincerely,

Jon Asbill

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cc: Jesse Ryan Oates, Esquire  
Robert Trippett Boineau, III, Esquire  
Heath McAlvin Stewart, III, Esquire  
Ruth Ann Levy, Esquire