

THE STATE OF SOUTH CAROLINA
In The Court Of Appeals

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APPEAL FROM THE ADMINISTRATIVE LAW COURT

SC Court of Appeals

The Honorable Shirley C. Robinson

Appellate Case No. 2020-000837
Case No. 19-ALJ-17-0001-CC

Eighteen Ink, LLC, d/b/a Group Therapy.....Respondent,

v.

South Carolina Department of Revenue,.....Respondent,

and

Thomas R. Gottshall, April C. Lucas, Michael Drennan.....Intervenors, Appellant.

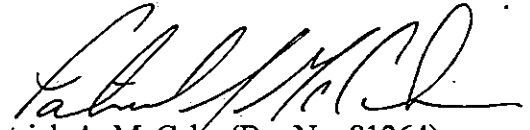
RESPONDENT’S MOTION TO EXTEND TIME TO FILE INITIAL REPLY BRIEF

Respondent, South Carolina Department of Revenue respectfully move the Court pursuant to Rule 263(b) of the appellate court rules to extend their time to final an initial reply brief by another 30 days. On April 29, 2020, the Administrative Law Court (ALC) entered a Final Order. The Appellant’s initial brief and designation of matter was filed on December 7, 2020. The Respondent’s Initial Reply Brief is currently due on January 6, 2021. Respondent respectfully seek 30 additional days to file its reply brief. This extension is sought to accommodate the holiday schedule of counsel principally responsible for that work. Prior to filing this motion, the undersigned consulted with counsel for Petitioner, Thomas R. Gotshall, April C. Lucas, and

Michael Drennan and Respondent, Eighteen Ink, LLC d/b/a Group Therapy who indicated they consent to the Respondent's Motion.

For the foregoing reasons, this motion should be granted.

Respectfully submitted,



Patrick A. McCabe (Bar No. 81264)
Counsel for Litigation
Adam J. Neil (Bar No. 69594)
Managing Counsel for Litigation
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Attorneys for Respondent
South Carolina Department of Revenue

December 23, 2020
Columbia, South Carolina.

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v.

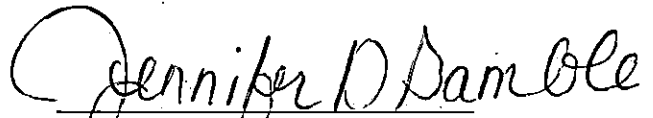
South Carolina Department of Revenue.....Respondent,

and

Thomas R. Gottshall, April C. Lucas, Michael Drennan.....Intervenors, Appellant.

PROOF OF SERVICE

I the undersigned employee of the South Carolina Department of Revenue, Office of General Counsel, do hereby certify that I have served the South Carolina Department of Revenue's Motion to Extend Time to File Initial Reply Brief in connection tithe the above captioned matter by causing a copy of the same to be deposited in the United States Mail on the below date, postage prepaid to the following parties at their address of record: John R. Alphin, Esquire of Strom Law Firm, LLC located at 6923 N. Trenholm Road, Suite 200, Columbia, SC 29206 and Christopher P. Kenney of Richard A. Harpootlian, P.A. located at 1410 Laurel Street, Columbia, SC 29201.



Jennifer D. Gamble
Paralegal, Office of General Counsel
South Carolina Department of Revenue

December 23, 2020
Columbia, South Carolina.

STATE OF SOUTH CAROLINA
DEPARTMENT OF REVENUE
OFFICE OF THE GENERAL COUNSEL

300A Outlet Pointe Blvd.
Columbia, SC 29210



PO Box 12265
Columbia, SC 29211-9979

December 23, 2020

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SC Court of Appeals

VIA US MAIL

The Honorable Jenny Abbott Kitchings
The South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

Re: Eighteen Ink, LLC, d/b/a Group Therapy v. SCDOR
Appellate Case No. 2020-000837

Dear Ms. Kitchings:

Enclosed for filing please find the original and one copy of Respondent's Motion to Extend Time to File Initial Reply Brief in regards to the above referenced matter. Also, enclosed is a Proof of Service for the same.

By copy of this letter, I am serving all counsel with a copy of the same.

Sincerely,

OFFICE OF GENERAL COUNSEL FOR LITIGATION

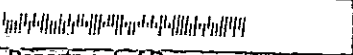
A handwritten signature in cursive script, appearing to read "Patrick A. McCabe".

Patrick A. McCabe, Esquire
Counsel for Litigation
Patrick.McCabe@dor.sc.gov
803-898-5056

PAM:jdjg

Enclosure

cc: John R. Alphin, Esquire
Christopher Phillip Kenney, Esquire



Department of Revenue
Office of General Counsel
P.O. Box 12265, Columbia, SC 29211-9979

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THE HONORABLE JENNY ABBOTT KITCHINGS
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