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Feb 11 2021

SC Court of Appeals

The State of South Carolina  
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT  
Ralph K. Anderson, III, Chief Administrative Law Judge

Appellate Case No. 2020-000983  
Civil Action No. 2017-ALJ-17-0237-CC

Clarendon County, Florence County, Lee County, Sumter County, Williamsburg County, Williamsburg County School District, Clarendon School District Two, Florence School District One, Florence School District Three, Sumter County School District, Clarendon County Hospital District, Lee County School District, and Clarendon School District One,..... Appellants/Respondents,

v.

South Carolina Dept. of Revenue, Farmers Telephone Cooperative, Inc., FTC Communications, LLC and FTC Diversified Services, LLC,.....Respondents,

of whom

Farmers Telephone Cooperative, Inc., FTC Communications, LLC and FTC, Diversified Services, LLC, are..... Respondents/Appellants.

**CONSENT MOTION FOR EXTENSION OF PAGE LIMITS  
FOR THE RESPONSE BRIEF OF RESPONDENTS/APPELLANTS**

Pursuant to Rules 208(b)(5) and 240, SCACR, Respondents/Appellants Farmers Telephone Cooperative, Inc., FTC Communications, LLC, and FTC, Diversified Services, LLC (collectively the “Farmers Entities”) hereby request a ten-page extension of the page limits for their Response brief. The Farmers Entities may not ultimately need all of these additional pages. This request is due to the number of issues raised in the Appellants/Respondent’s primary brief (which was itself in excess of 50 pages) to which the Farmers Entities are responding.

Counsel for Respondent consented to this request. Counsel for Appellants/Respondents have likewise consented to this request and have themselves moved for an undefined number of additional pages in their Response brief for reasons similar to those set forth herein. No party will be prejudiced by the extension requested in this Motion.

Respectfully submitted,

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*Attorney for Respondents/Appellants Farmers Telephone  
Cooperative, Inc., FTC Communications, LLC and FTC,  
Diversified Services, LLC*

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Clarendon County, Florence County, Lee County, Sumter  
County, Williamsburg County, Williamsburg County School  
District, Clarendon School District Two, Florence School District  
One, Florence School District Three, Sumter County School  
District, Clarendon County Hospital District, Lee County School  
District, and Clarendon School District One,..... Appellants/Respondents,

v.

South Carolina Dept. of Revenue, Farmers Telephone Cooperative,  
Inc., FTC Communications, LLC and FTC Diversified Services,  
LLC,..... Respondents,

of whom

Farmers Telephone Cooperative, Inc., FTC Communications, LLC  
and FTC Diversified Services, LLC, are..... Respondents/Appellants.

**PROOF OF SERVICE**

Pursuant to Section g(3) of Chief Justice Beatty’s Amended Order dated May 29, 2020,  
undersigned counsel hereby certifies I have served a copy of Respondents/Appellants’ Consent  
Motion for an Extension of Page Limits on the parties’ counsel of record set out below by  
electronic mail (see attached sent email) :

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By:   
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Miles E. Coleman

*Attorney for Respondents/Appellants Farmers Telephone  
Cooperative, Inc., FTC Communications, LLC and FTC,  
Diversified Services, LLC*

Greenville, South Carolina  
February 11, 2020

## Miles Coleman

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**From:** Miles Coleman  
**Sent:** Thursday, February 11, 2021 10:29 AM  
**To:** Cartin, Walt H.; Madison Felder; katondawson@parkerpoe.com; 'Michael Kozlarek'; Jason Luther  
**Cc:** Bryson Geer; John Von Lehe  
**Subject:** Clarendon Cnty. et al. v. SCDOR et al. -- Farmers Entities' Mot. for Ext. of Pages  
**Attachments:** 2021.2.11 -- Clarendon Cnty. v. SCDOR et al. -- Farmers Entities' Mot. for Ext. of Pages.pdf

All — please find attached for electronic service in the above-referenced matter a PDF of Respondents/Appellants' Consent Motion for an Extension of Page Limits for their Response Brief. A copy of this Motion will be filed with the Court of Appeals shortly.

Miles



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MILES COLEMAN **PARTNER**

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February 11, 2021

**Via electronic mail and hand delivery**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
The South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

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**Feb 11 2021**

**SC Court of Appeals**

RE: *Clarendon County et al. v. S.C. Dept. of Revenue et al.*  
Appellate Case No. 2020-000983  
Our File No. 029623/09019

Dear Ms. Kitchings:

Please find enclosed for filing in the above-referenced matter Respondents/Appellants' Consent Motion for an Extension of Page Limits for their Response Brief. Also enclosed is a proof of service. We ask that you file the Motion and, if possible, return an electronic version to us bearing the Court's file stamp.

A hard copy of the enclosed materials and a Firm check for the filing fee to accompany the Motion will be delivered to the Court by courier today. Please do not hesitate to contact us with any questions or if we can be of assistance in any way.

Very truly yours,



Miles E. Coleman

Enclosures

CC: (By electronic mail)

Jason Luther, Esq.  
Walt Cartin., Esq.  
Madison Felder, Esq.  
Katon Dawson, Jr., Esq.  
Bryson Geer, Esq.  
John von Lehe, Jr., Esq.