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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 TO FILE AN AMENDED COUNTER-DESIGNATION OF
MATTER TO BE INCLUDED IN THE RECORD ON APPEAL**

Respondents/Appellants Farmers Telephone Cooperative, Inc. (“Farmers Co-op”), FTC
Communications, LLC (“FTCC”), and FTC Diversified Services, LLC (“Diversified”)
(collectively the “Farmers Entities”), hereby seek leave of the Court to file an Amended Counter-
Designation of Matter to be Included in the Record on Appeal.

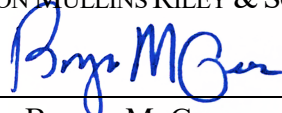
The Farmers Entities filed their Counter-Designation in this matter on February 12, 2021.
They subsequently realized that their Counter-Designation had inadvertently misidentified the
dates or exhibit numbers of a few items listed therein and had designated two items in error.

Counsel for the Farmers Entities has consulted with counsel for Respondent and with counsel for Appellants/Respondents regarding the specific changes in the Amended Counter-Designation enclosed herein, and counsel for all parties has consented to those changes and to this Motion. Accordingly, the Farmers Entities seek leave of this Court to file the Amended Counter-Designation enclosed here.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: _____



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Diversified Services, LLC*

April 23, 2021
Charleston, South Carolina

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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Ralph King Anderson, III, Chief Administrative Law Judge

Case No. 17-ALJ-17-0237-CC

Appellate Case No. 2020-000983

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.

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

and

South Carolina Department of Revenue Respondent.

PROOF OF SERVICE

I hereby certify that I have served via electronic mail a copy of the foregoing *Consent Motion to File an Amended Counter-Designation of Matter to be Included in the Record on Appeal and Amended Counter Designation of Matter to Be Included in the Record on Appeal* of Respondents/Appellants Farmers Telephone Cooperative, Inc., FTC Communications, LLC, and FTC Diversified Services, LLC on parties' counsel of record at the following AIS information addresses:

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April 23, 2021

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April 23, 2021

VIA E-MAIL (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
PO Box 11629
Columbia, SC 29211

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SC Court of Appeals

RE: Clarendon County, et al. v. South Carolina Department of Revenue, Farmers Telephone Cooperative, Inc., FTC Communications, LLC, and FTC Diversified Services, LLC
Appellate Case No.: 2020-000983
Our File No.: 029623/09019

Dear Ms. Kitchings:

Enclosed for filing in the above matter, please find Respondents/Appellants Farmers Telephone Cooperative, Inc., FTC Communications, LLC and FTC Diversified Services, LLC's Consent Motion to File an Amended Counter-Designation of Matter to be Included in the Record on Appeal, Amended Counter Designation of Matter to be Included in the Record on Appeal, and Proof of Service.

By copy of this letter to all counsel, we are hereby serving them with a copy of each of the above documents. We ask that, at your convenience, you return a copy of the attached documents to us bearing the Court's file stamp.

Thank you for your assistance, and please do not hesitate to contact us should the Court require any additional information.

With kind regards,



Bryson M. Geer

BMG:ls

Enclosures

cc: Walter H. Cartin, Esq.
Katon E. Dawson, Jr., Esq.
Madison Felder, Esq.
Michael E. Kozlarek, Esq.
Jason P. Luther, Esq. (*all via e-mail*)