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**IN THE SUPREME COURT OF APPEALS OF WEST VIRGINIA**

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**SOUTHCO DEVELOPMENT, LLC,**

**Plaintiff,**

**v.**

**MONONGALIA COUNTY  
DEVELOPMENT AUTHORITY,  
LARSON DESIGN GROUP, INC.,  
and HOLLY CHILDS,**

**Defendants.**

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: **CIVIL ACTION NO. 16-C-575**  
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**LARSON DESIGN'S REPLY MEMORANDUM TO THE PLAINTIFF'S  
MOTION TO REFER MATTER TO BUSINESS COURT DIVISION**

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Paul M. Mannix, Esquire  
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Larson Design Group, Inc.

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The Defendant, Larson Design Group, Inc. ("Larson") brings the following response to the Plaintiff's Motion to Refer Matter to Business Court Division. Larson joins in those arguments set forth more fully in the Reply Memorandum filed by Monongalia County Development Authority ("MCDA") and objects to the removal of the case the Business Court as it does not involve a complex commercial litigation case between business entities.

Larson Design maintains that this case does not meet the criteria for removal to the Business Court Division. The Honorable Phillip D. Gaujot, in The Circuit Court of Monongalia, County, West Virginia, is capable of presiding over this matter and a jury can adequately decide these issues.

THEREFORE, Larson Design respectfully requests that the Court deny the Plaintiff's  
Motion to Refer Matter to Business Court Division.

LARSON DESIGN GROUP, INC.  
By Counsel,

A handwritten signature in black ink, appearing to be 'P. Mannix', written over a horizontal line.

Paul M. Mannix, Esquire  
West Virginia I.D. #7193

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of March, 2017, I served the foregoing Larson Design's Reply Memorandum to Defendants' Motion to Refer Matter to Business Court Division, upon the following, via United States Mail, postage prepaid:

Debra Tedeschi Varner, Esquire  
Michael A. Secret, Esquire  
McNeer, Highland, McMunn and Varner  
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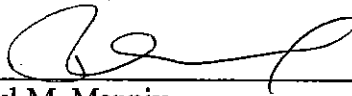
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(Counsel for Holly Childs)

Jean Friend, Clerk  
Circuit Court of Monongalia County  
Monongalia County Justice Center  
75 High Street, Suite 12  
Morgantown, WV 26505

Honorable Phillip D. Gaujot  
Circuit Court of Monongalia County  
Monongalia County Justice Center  
75 High Street, Suite 31  
Morgantown, WV 26505

The Central Office of the Business Court Division  
380 W. South Street, Suite 2100  
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