

IN THE CIRCUIT COURT OF HARRISON COUNTY, WEST VIRGINIA

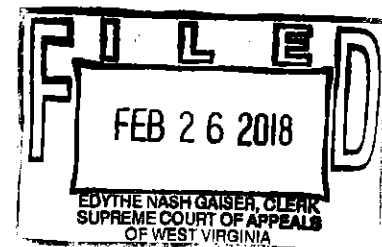
COMMUNITY CARE OF WEST VIRGINIA, INC.,

Plaintiff,

v.

CIVIL ACTION NO. 17-c-318-2  
(Judge Thomas A. Bedell)

FRONTIER COMMUNICATIONS OF  
AMERICA, INC., its parents, subsidiaries, and  
affiliates; TAMCO CAPITAL CORPORATION,  
its parents, subsidiaries, and affiliates;  
ANTHONY ROME; and  
MICHAEL SHAFFER,



Defendants.


**RESPONSE OF DEFENDANT TAMCO CAPITAL CORPORATION**  
**TO "JUDICIAL MOTION TO REFER CASE TO**  
**THE BUSINESS COURT DIVISION"**

The Defendant TAMCO Capital Corporation, by and through its counsel, Debra Scudiere and the law firm of Kay Casto & Chaney PLLC, without waiving any defenses, responds herein to the **Judicial Motion to Refer Case to the Business Court Division** as filed by The Honorable Thomas A. Bedell, Judge of the Fifteenth Judicial Circuit Court, Harrison County, Division 2.

While the Defendant TAMCO Capital Corporation continues to deny any and all substantive claims as filed against it by the Plaintiff; denies the allegation as repeated in the **Judicial Motion** that TAMCO Capital Corporation is in any way "Frontier's alter-ego"; and denies any and all requests for an award of damages against it, the Defendant TAMCO Capital Corporation nevertheless understands the points being made by Judge Bedell as to why this case is suitable for referral to the Business Court Division.

WHEREFORE, with the request that no scheduling changes be made to its detriment, the Defendant TAMCO Capital Corporation states that it has no objection to the **Judicial Motion to Refer Case to the Business Court Division** and will abide by any ruling which may refer the matter to the Business Court Division.

DEFENDANT  
TAMCO CAPITAL CORPORATION  
BY COUNSEL

  
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**its parents, subsidiaries, and affiliates;**  
**ANTHONY ROME; and**  
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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **RESPONSE OF**  
**DEFENDANT TAMCO CAPITAL CORPORATION TO "JUDICIAL MOTION**  
**TO REFER CASE TO THE BUSINESS COURT DIVISION"** upon the parties on the  
23d day of February, 2018, by mailing a true copy thereof by United States mail, postage  
prepaid, to the following counsel of record:

Dan Earl, Esq.  
John H. Mahaney, Esq.  
Arie M. Spitz, Esq.  
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*Defendant Appearing Pro Se*

  
Debra Scudiere