

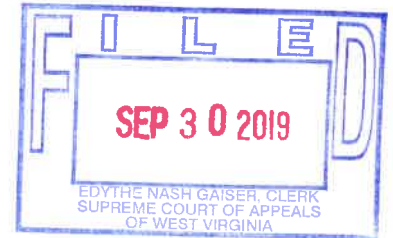


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Via Hand-Delivery
Edythe Nash Gaiser
Clerk of Court
State Capitol Rm E-317
1900 Kanawha Blvd. East
Charleston WV 25305
F: (304) 558-3815

September 30, 2019



Re: *Dallas T. Runyon, Sr., et al., v. Citizen's Communication Company of West Virginia et. al., Case No. 17-C-108*

Ms. Gaiser:

Enclosed for filing in the above-referenced case is the ***Plaintiffs' Response in Support of Joint Motion to Refer Case to Business Court Division***. Please don't hesitate to contact us with any questions or concerns.

Thank you for your assistance in this matter.

Sincerely,

Michael B. Hissam

MBH/vas
Enclosure

cc: Rhonda L. Harvey, Esq.
Brad Sorrells, Esq.

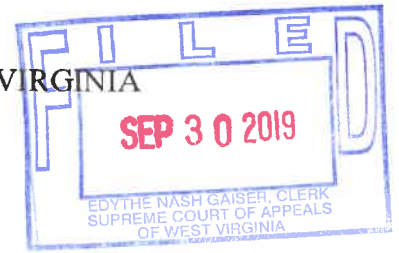
IN THE SUPREME COURT OF APPEALS OF WEST VIRGINIA

DALLAS T. RUNYON, SR.
and DAVID E. RUNYON,

Plaintiffs,

v.

Circuit Court of Mingo County
Civil Action No. 17-C-108



CITIZENS TELECOMMUNICATIONS
COMPANY OF WEST VIRGINIA;
FRONTIER WEST VIRGINIA, INC.; and
APPALACHIAN POWER COMPANY,

Defendants.

TO: CHIEF JUSTICE ELIZABETH D. WALKER


**PLAINTIFFS' RESPONSE IN SUPPORT OF JOINT MOTION TO
REFER CASE TO BUSINESS COURT DIVISION**

Pending is Defendants' *Joint Motion to Refer Case to the Business Court Division*.

Plaintiffs Dallas and David Runyon agree that this case satisfies the definition of "business litigation" and do not oppose the Defendants' motion.

DALLAS T. RUNYON
DAVID E. RUNYON

By Counsel:



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CERTIFICATE OF SERVICE

The undersigned, Michael B. Hissam, counsel for the Plaintiffs, Dallas T. Runyon, Sr. and David E. Runyon, does hereby certify that a true copy of the attached ***Plaintiffs' Response in Support of Joint Motion to Refer Case to Business Court Division*** has been served this the 30th day of September 2019, upon counsel of record via United States Mail to the addresses listed below:

Ronda L. Harvey
Bowles Rice, LLP
600 Quarrier Street
Charleston, West Virginia 25301
Counsel for Defendant, Frontier

Brad Sorrells
Robinson & McElwee, PLLC
700 Virginia Street, East
Charleston, WV 25301
Counsel for Defendant, Appalachian Power Company



Michael B. Hissam (WVSB #11526)