IN THE SUPREME COURT OF APPEALS OF WEST VIRGINIA

OMEGA FACILITY SERVICES, SOLUTIONS & SURETY, et al.,

Plaintiffs,

vs.

Kanawha County Civil Action No. 14-C-1745 Judge Carrie Webster

JACOBS & COMPANY, Inc., et al.

REPLY MEMORANDUM TO DEFENDANT'S MOTION TO REFER TO THE BUSINESS COURT DIVISION

Now Come the Plaintiffs, by counsel, and join the Defendants' Motion to Refer to the Business Court Division. Given the nature of the case, and the reasons recited in the Defendants' brief in support of their motion, this case appears to be an appropriate case for resolution in business court.

WHEREFORE, the Plaintiffs join the Defendants Motion to Refer to the Business Court Division, and move the Court to assign the matter to the Business Court Division pursuant to West Virginia Trial Court Rule 29.06(c)(3), and any and all such other relief as this Honorable Court may deem just and proper.

OMEGA FACILITY SERVICES, SOLUTIONS, AND SURETY, LLC. JEFFREY R. BROWN SUSAN L. BROWN

BY COUNSEL

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CERTIFICATE OF SERVICE

I, Brandon S. Steele, hereby certify that I have this day served the within REPLY MEMORANDUM TO DEFENDANT'S MOTION TO REFER TO THE BUSINESS COURT DIVISION by mailing a true copy thereof, by United States mail, postage prepaid, on this the 4th day of December, 2014 upon the following:

Honorable Carrie L. Webster, Judge Kanawha County Judicial Annex 111 Court Street Charleston, WV 25301 Herschel H. Rose, III Rose Law Office PO Box 3502 Charleston, WV 25335

Stephen P. Meyer, Esq. Meyer, Ford, Glasser, and Redman, PLLC PO Box 11090 Charleston, WV 25339

Brandon S. Steele