

BROWN, BYRD, BLAKELY, MASSEY & LEAPHART, P.A.
 ATTORNEYS AT LAW
 GREENVILLE, SOUTH CAROLINA 29602

C. VINCENT BROWN
 W. WAYNE BYRD
 JAMES C. BLAKELY, JR.
 D. DAVID MASSEY
 DEN G. LEAPHART

SUITE 15 100 EAST NORTH STREET
 POST OFFICE BOX 4004
 TELEPHONE 871-1444
 AREA CODE 803

December 19, 1980

Mr. E. G. Frampton
 Documentary Stamps Division
 South Carolina Tax Commission
 Post Office Box 125
 Columbia, South Carolina 29614

Re: 100 Associates, a
 General Partnership

Dear Mr. Frampton:

In accordance with our telephone conversation of Wednesday, December 17th, you indicated that you would give an opinion that no documentary stamps are due in the following situation:

1. Property was deeded from B. J. Fuller to Messrs. Philip S. Rovner and Alan P. Shaw on December 5, 1980 and documentary stamps were placed on that Deed.
2. The partnership entity, 100 Associates, a General Partnership, had been in existence in excess of one year prior to that transfer.
3. Messrs. Rovner and Shaw had interests of 50% each for some time in the partnership.
4. The real estate deeded by Mr. Fuller was acquired with partnership funds.
5. The deed to Messrs. Rovner and Shaw was simply an error on our part, as it should have been deeded to 100 Associates, a General Partnership.

~~We now want to place on the records a corrective deed~~

Mr. E. G. Frampton
 December 19, 1980
 Page Two

and request that your office issue an opinion that no documentary stamps are necessary on that transfer.

If I can be of any further assistance in this regard, please let me know.

Yours very truly,

BROWN, BYRD, BLAKELY, MASSEY
 & LEAPHART, P.A.