



IN THE SUPREME COURT OF THE STATE OF DELAWARE

DONNA F. MILLER, :
 :
 Plaintiff Below, Appellant, : No. 394, 2014
 :
 v. : On Appeal from the Court of
 : Chancery of the State of
 : Delaware
 NATIONAL LAND PARTNERS, LLC, *et al.* :
 : C.A. No. 7977-VCG
 Defendants Below, Appellees. :

APPELLEES LEON HUNTER WILSON AND HUNTER COMPANY OF WEST VIRGINIA'S JOINDER TO DEFENDANT NATIONAL LAND PARTNERS, L.L.C.'S ANSWERING BRIEF ON APPEAL

On July 25, 2014, Plaintiff Donna Miller (“Miller”) filed a Notice of Appeal from the Delaware Court of Chancery’s June 26, 2014 Final Order. D.I. 1. On August 11, 2014, Defendant National Land Partners L.L.C. (“NLP”) filed a notice of cross-appeal. D.I. 12. On September 17, 2014, Plaintiff filed a Corrected Opening Brief (the “Miller Opening Brief”) (D.I. 17). On October 13, 2014, NLP filed its Opening Brief on Cross-Appeal (the “NLP Cross-Appeal”) and Answering Brief on Appeal (the “NLP Answering Brief”).

Defendants Leon Hunter Wilson (“Wilson”) and Hunter Company of West Virginia (“HCWV” and together with Wilson, “Hunter Defendants”), by and through their undersigned counsel, hereby join in and incorporate here by reference as if set forth at length, the arguments and legal authorities in the NLP Answering Brief, Section A (regarding declaratory judgment related to Section 4.3 of the

Agreements), and Section B (regarding weight of witness testimony). Hunter Defendants take no position on the NLP Answering Brief, Section C (regarding denial of motion to compel), as the underlying motion to compel was directed to NLP, and as such, Hunter Defendants took no position on the respective motion in the Court of Chancery proceedings. D.I. 86.

Hunter Defendants did not assert a cross-appeal or join NLP's Cross-Appeal regarding Plaintiff's lack of standing, but supported the arguments asserted in NLP's briefs, below, on this issue. D.I. 30-32, 50-51.

For the reasons set forth in the NLP Answering Brief, Wilson and HCWW respectfully request that the Court of Chancery Final Order be affirmed.

Dated: October 13, 2014

PINCKNEY, WEIDINGER, URBAN &
JOYCE LLC

/s/ Joanne P. Pinckney

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CERTIFICATE OF SERVICE

I, Joanne P. Pinckney, Esquire, hereby certify that on October 13, 2014, a copy of the foregoing *Appellees Leon Hunter Wilson and Hunter Company of West Virginia's Joinder to Defendant National Land Partners, L.L.C.'s Answering Brief on Appeal* was served via File & ServeXpress upon:

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