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May 23, 2025

Low-Income Housing Tax Credit Program
South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Blvd.
Columbia, South Carolina 29210

Re: Name of Development: **Eureka Mills**
Address: **TMS 079-01-08-004-00, Parkway Drive, Chester, SC**
Applicant: **Eureka Mill Apartments, LLC**

Ladies and Gentlemen:

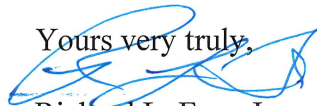
This letter is provided in connection with an opinion rendered in compliance with the requirements of the Low-Income Housing Tax Credit Program.

The undersigned is a licensed attorney-at-law, licensed to practice before the highest court in the state of South Carolina. A significant portion of my practice relates to tax matters including Historic Tax Credits (Federal), Certified Historic Structure Credit (SC), Certified Historic Residential Structure Credit (SC), Textile Rehabilitation Credit (SC), Abandoned Building Revitalization Credit (SC) and Brownfields Cleanup Credit (SC) and the interpretation of the Internal Revenue Code of 1986 (the "Code"), as amended. I am familiar with the provisions of section 42 of the Internal Revenue Code, as amended, and have advised the owner with regard to its applicability to the above-referenced development.

Based upon an independent investigation into the facts and circumstances surrounding the above-referenced development, I am providing my opinion with respect to the qualification of the development for an allocation of abandoned textile mill site credits in the amount listed on the above-referenced development application dated May 23, 2025, which opinion is attached to this letter.

It is my intention that the South Carolina State Housing Finance and Development Authority may rely on this opinion in making its determination whether or not to offer a reservation of the Low-Income Housing Tax Credit to this development.

Yours very truly,



Richard L. Few, Jr.



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 Applicant: **Eureka Mill Apartments, LLC**

Ladies and Gentlemen:

This opinion is rendered in compliance with the requirements of the Low-Income Housing Tax Credit Program.

We have acted as counsel to Eureka Mill Apartments, LLC, a South Carolina limited liability company (the "Applicant") in connection with its application to the South Carolina State Housing Finance and Development Authority (the "Authority") for a reservation of the Low-Income Housing Tax Credit for the Applicant's proposed development of Eureka Mills on Parkway Drive in Chester, South Carolina. (the "Development"). This opinion is being rendered at the request of the Authority and is intended that the Authority may rely upon this opinion in making its determination whether or not to offer a reservation of the Low-Income Housing Tax Credit with respect to the Development.

We are licensed to practice law in the State of South Carolina. The opinions set forth herein are limited to matters governed by the laws of the State of South Carolina and the laws of the United States (the "Applicable Laws"). No opinion is expressed herein as to the laws of any other jurisdiction. The attorney signing this opinion is a licensed attorney-at-law, licensed to practice before the highest court in the state of South Carolina. A significant portion of our practice with respect to the Applicable Laws relates to tax matters including tax credits for projects, such as the Development, qualifying under the Textile Communities Revitalization Act (SC Code Sections 12-65-10 *et seq.*) (the "Act") and the interpretation of the Internal Revenue Code of 1986, as amended (the "Code"), including the provisions of Section 42 of the Code, as amended. We have

consulted with and advised the Applicant concerning the applicability and requirements of the Act and the relevant Code provisions to the Development.

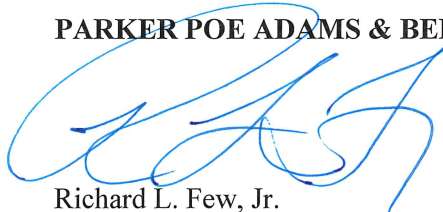
Subject to the foregoing and to the qualifications, limitations, exceptions and assumptions set forth below, and upon the Applicable Laws and facts of which we are aware on the date of this opinion letter, we are of the opinion as of the date hereof:

1. Based upon an independent investigation into the facts and circumstances surrounding the Development and its condition and ownership by the Applicant as of the date hereof, the Applicant is eligible for an allocation of abandoned textile mill tax credits pursuant to the Act, with the estimated amount of such tax credits being listed on the Applicant's application to the Authority dated May 23, 2025.

In rendering this opinion, we have assumed the Applicant will comply with all applicable requirements of the Act in order to qualify for the tax credits authorized thereunder from and after the date hereof. We assume no duty to update or supplement this opinion if there are changes in the Act, the Applicable Laws or the facts that we have reviewed after the date hereof. This opinion is rendered solely for the benefit of the Authority. This opinion may not be used or relied upon by any other persons or entities or for any other purpose without our express written consent.

Very truly yours,

PARKER POE ADAMS & BERNSTEIN LLP



Richard L. Few, Jr.

RLF:rf