

**SPEED, SETA, MARTIN, TRIVETT, STUBLEY & FICKLING, LLC**  
**ATTORNEYS AT LAW**

WALLACE SPEED (1940-2020)  
LESLI R. SETA (GA & FL)  
SETH C. MARTIN (GA & FL)  
ERIC L. TRIVETT (GA)  
M. STEPHEN STUBLEY (SC)  
JAMES E.L. FICKLING (SC & NC)  
STEPHANIE A. ROCKWELL (GA & TN)  
ANDREA S. OWEN (GA)  
HUNTER CHANDLER (GA & TN)

REPLY TO  
P.O. BOX 11669  
COLUMBIA, SOUTH CAROLINA 29211  
PHONE (803) 748-2919  
FAX (803) 748-2735  
www.Speed-Seta.com

ALEXANDER ADKINS (GA & TN)  
ANDYNE B. ANDERSON (GA)  
SCOTT H. ANDREWS (GA)  
LILY WILKERSON BURKHART (GA & FL)  
JEREMY T. ENGLAND (AL & MS)  
SADIE GIBSON (GA)  
C. BENTON HILBURN (GA)  
R. HEATH OWEN (SC)  
CALEY A. PITTS (GA)  
KELSIE L. QUEEN (SC & NC)  
JENNIFER S. RAY (GA)  
LAWRENCE ROSS (GA)  
RICHARD W. SIMMONS, II (SC)  
LINDSEY R. STEWART (GA)  
BRIGGS P. TUCKER (SC)  
BRITTANY BELL TURNER (GA & FL)  
GEORGE D. GALLAGHER (SC)

September 8, 2022

**VIA EMAIL: CTAPPFILINGS@SCCOURTS.ORG**

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

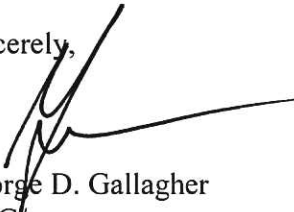
**RE:** *Rachel Turner v. SC Department of Corrections – Kirkland, et al*  
*Appellate Case No.: 2021-000633*  
*WCC No.: 1514359*  
*DOA: 9/5/2015*  
*Our File No.: 8400-0101*

**RECEIVED**  
**Sep 08 2022**  
**SC Court of Appeals**

Dear Ms. Kitchings:

Please find enclosed the Final Appellant's Brief, Final Respondent's Brief and Final Reply Brief of the Respondent-Appellant in the above-referenced matter. A bound copy of each is in the mail. By copy of this letter to all counsel of the involved parties, I am serving them with these briefs via email and regular mail.

Sincerely,

  
George D. Gallagher  
GDG/rco  
Enclosures

cc: The Hon. Amy Bracy  
Stephen B. Samuels, Esq.  
Erin Farthing, Esq.  
Gregory M. Alford, Esq.  
Lisa C. Glover, Esq.  
Beth Richardson, Esq.  
Jasmine Smith, Esq.

Grady L. Beard, Esq.  
James P. Newman, Jr., Esq.  
Tom Sears, Esq.