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ADMITTED TO THE UNITED STATES  
SUPREME COURT BAR

ADMITTED IN SOUTH CAROLINA,  
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November 15, 2022

**RECEIVED**

**Nov 15 2022**

**SC Court of Appeals**

**Via E-Mail Attachment to: msingleton@sccourts.org**

Ms. Mary-Caitlyn Singleton  
Appeals Specialist  
SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**Re: Georgia Harrison, et al. vs. Stephanie Lorraine Kirkland, et al.; Appellate Case Number: 2022-000277; Appellants' filing of another "Amended Initial Brief" on November 14, 2022**

Dear Ms. Singleton,

As your file indicates, Chet Williams and I represent the Respondents in this appeal. I am writing the Court this morning to advise that the Respondents object to the Court's consideration of the new "Appellants' Amended Initial Brief" that was filed by Mr. Houston on November 14, 2022, along with an Amended Designation of Matter.

By letter dated November 1, 2022 from the Honorable Claire Allen, Mr. Houston was advised that he had ten (10) days from November 1, 2022 to correct certain deficiencies in both the Appellants' Initial Brief and the Appellants' Initial Designation of Matter, as were filed on October 17, 2022. Mr. Houston failed to meet the time requirements of Clerk Allen's November 1, 2022 letter and therefore the appeal should have been dismissed as Mr. Houston was advised it would be, if he failed to correct the deficiencies by November 11, 2022.

Further, and of critical importance, I draw the Court's attention to the fact that Mr. Houston and the Appellants *did not* correct the deficiencies in the Appellants' Initial Brief as was filed on October 17, 2022, and which we contend is the only legitimate version of the Appellants' Initial Brief before the Court for consideration. Instead, he chose to "correct the deficiencies" by changing and supplementing certain portions of the "Appellants' Amended Initial Brief" that was filed on November 2, 2022, to which the Respondents objected by letter dated November 2, 2022, and which is the subject of the Respondents' pending Motion To Strike as was filed on November 7, 2022. This appears to us to be an intentional ruse to use the deficiency letters (which were not timely complied with) as a trojan horse to place the improper "Appellants' Amended Initial Brief" of November 2, 2022, into the Court's formal filing process that should be reserved for appropriately and timely filed documents.

Ms. Mary-Caitlyn Singleton  
Appeals Specialist

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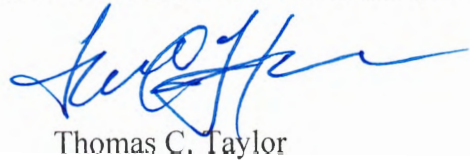
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As I noted in my original letter of November 2, 2022, the "amended" Initial Brief filed by the Appellants on November 2, 2022, was a substantively changed and supplemented document and amounted to a wholesale revision of the Appellants' original Initial Brief filed October 17, 2022, and that "amended" Initial Brief of November 2, 2022 (and now of November 14, 2022), should be rejected by the Court and may not appropriately be considered.

Please make this letter a part of the Court's file in this matter. Thank you. Mr. Houston is copied on this court communication of course. Please let me know if you have any questions.

Cordially yours,

LAW OFFICE OF THOMAS C. TAYLOR, LLC



Thomas C. Taylor

TCT/dpt

cc: Chester C. Williams, Esq., via email transmittal  
Andre J. White, via email transmittal  
Charles E. Houston, Esq., via email transmittal  
Terry A. Finger, Esq., via email transmittal