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**Jul 03 2023**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM BARNWELL COUNTY  
In the Court of Common Pleas

Doyet A. Early, III, Circuit Court Judge  
Clifton B. Newman, Circuit Court Judge

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Lower Court Case No. 2013-CP-06-0059  
Appellate Case No. 2019-000599

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Lorenda Robinson, Elaine Nix, Archie Patterson,  
And Tami Bollerman, ..... Plaintiffs,

Of Whom, Archie Patterson and Tami Bollerman are the Respondents/Appellants,

v.

South Carolina Department of Employment and  
Workforce, ..... Appellant/Respondent.

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PROOF OF SERVICE

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I certify that I have this day deposited in the United States Mail, first class, a bounded and unbounded copy of Respondents' Brief In Response to Amici Curiae Brief to the Clerk of the South Carolina Court of Appeals, along with this Proof of Service, and that I have served the Respondents' Brief In Response To Amici Curiae Brief on the following counsel of record by email on July 3, 2023. A copy of the emails are attached. I have also filed this Brief and Proof of Service at [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).

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Barnwell, South Carolina  
July 3, 2023

**From:** dan@danwilliamslaw.com  
**Sent:** Monday, July 3, 2023 1:18 PM  
**To:** jessicagodwin@scsenate.gov; kenmoffitt@scsenate.gov; johnhazard@scsenate.gov; patrickdennis@schouse.gov; hayleymottel@schouse.gov; wdavidson@dml-law.com; 'Kenneth P. Woodington'; rstepp@robinsongray.com; rtyson@robinsongray.com; ltraywick@robinsongray.com; cbhutto@williamsattys.com; sberk@scjustice.org; Adam Protheroe; 'Alexander Paterra'  
**Cc:** andrea@danwilliamslaw.com; 'Branna Williams'  
**Subject:** Patterson, et. al. v. South Carolina Department of Employment and Workforce Appellate Case No. 2019-000599  
**Attachments:** RESPONDENTS' BRIEF IN RESPONSE TO AMICUS.pdf

Everyone,  
Please find attached the Respondents' Brief in Response to the Amicus Curiae Brief which I am hereby serving on you. I will be filing the brief both electronically and by placing it in the mail, together with a Proof of Service, today. Please let me know if you have any questions.  
Dan

**From:** dan@danwilliamslaw.com  
**Sent:** Monday, July 3, 2023 1:53 PM  
**To:** stevedavidson@schouse.gov  
**Subject:** FW: Patterson, et, al. v. South Carolina Department of Employment and Workforce Appellate Case No. 2019-000599  
**Attachments:** RESPONDENTS' BRIEF IN RESPONSE TO AMICUS.pdf

Mr, Davidson,  
I apologize. I inadvertently left you off my original email. Please find attached the Respondents' Brief in Response to the Amicus Curiae Brief which I am serving on you. I will be filing the brief both electronically and by placing it in the mail, together with a Proof of Service, today. Please let me know if you have any questions.  
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**To:** jessicagodwin@scsenate.gov; kenmoffitt@scsenate.gov; johnhazard@scsenate.gov; patrickdennis@schouse.gov; hayleymottel@schouse.gov; w davidson@dml-law.com; 'Kenneth P. Woodington' <kwoodington@DML-LAW.com>; rstepp@robinsongray.com; rtyson@robinsongray.com; ltraywick@robinsongray.com; cbhutto@williamsattys.com; sberk@scjustice.org; Adam Protheroe <adam@scjustice.org>; 'Alexander Paterra' <alex.paterra@paterralaw.com>  
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Dan

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VIA EMAIL ([ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)) & U.S. MAIL  
July 3, 2023

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate St.  
Columbia SC 29201

RE: Archie Patterson v. SCDEW  
Appellate Case No.: 2019-000599

Dear Ms. Kitchings:

Enclosed for filing with the court please find one bound and one unbound copy of the Respondents' Brief in Response to Amici Curiae Brief with Proof of Service submitted on behalf of the Respondents Archie Patterson and Tami Bollerman in connection with the above matter.

Thank you for your courtesies in this matter. Please advise immediately should you have any questions or concerns in this matter.

Sincerely,



Daniel W. Williams

DWW:ar  
Enc.

**(by email only)**  
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