

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

**May 14 2024**

**SC Court of Appeals**

---

APPEAL FROM LANCASTER COUNTY  
Court of Common Pleas

Daniel D. Hall, Circuit Court Judge

---

Appellate Case No. 2023-001405

---

Linda C. Horne, ..... Appellant,

v.

Kelsey Rae Clapp, ..... Respondent.

---

**CERTIFICATE OF COUNSEL**

---

Pursuant to Rule 211(a), SCACR, Appellant's counsel hereby certifies that the Appellant's Brief and Reply Brief comply with Rule 211(b), SCACR.

Respectfully submitted,

/s/ Jordan C. Calloway

Daniel W. Luginbill  
McGowan, Hood, Felder & Phillips, LLC  
10 Shem Drive, Suite 300  
Mt. Pleasant, SC 29464  
dluginbill@mcgowanhood.com

Jordan C. Calloway  
McGowan, Hood, Felder & Phillips, LLC  
1539 Health Care Drive  
Rock Hill, SC 29732  
(803) 327-7800  
[jcalloway@mcgowanhood.com](mailto:jcalloway@mcgowanhood.com)

David R. Blackwell  
David Blackwell Law, LLC  
118 Shiloh Unity Road  
P.O. Box 2799  
Lancaster, SC 29721  
david@davidblackwelllaw.com

Attorneys for Appellant

May 14, 2024  
Rock Hill, SC