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November 11, 2013

The Honorable Marcia M. Waldron
Clerk of Court
United States Court of Appeals, Third Circuit
21400 United States Courthouse
601 Market Street
Philadelphia, PA 19106

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S.C. Supreme Court

Re: Lavona Hill v. Bert Bell, C.A. No. 10-4577 (E.D. Pa. No. 2-09-CV-04051);
South Carolina Appellate Case No. 2012-212193

Dear Ms. Waldron:

The District Court of the Eastern District of Pennsylvania found on behalf of our client, Lavona Hill, Plaintiff in the Lower Court and Appellee in the Appellate Court. The undersigned counsel for Plaintiff/Appellee Lavona Hill believes that was a correct decision.

Subsequently, the Third Circuit Court of Appeals asked the South Carolina Supreme Court to answer a question of South Carolina law on the gravamen issue in the matter. The South Carolina Supreme Court answered the question of law and their answer was consistent with Plaintiff/Appellee's argument during the course of this litigation, i.e. that Defendant/Appellant's marriage with Mr. Thomas Sullivan was void because it was bigamous under South Carolina law and South Carolina doesn't recognize bigamous marriages. Further, the undersigned counsel for Plaintiff/Appellee Lavona Hill is not aware of any other significant decisions that were not referred to in Ms. Hill's brief.

Accordingly, because the South Carolina Supreme Court has concurred with the findings of the Eastern District Court of Pennsylvania, Ms. Hill respectfully requests that this Honorable Court affirm the decision of the Eastern District Court.

Very truly yours,



DAVID B. SHERMAN

DBS/rdb

CC: Lawrence Solomon, Esquire
Robert T. Vance, Esquire
Clerk, Supreme Court of South Carolina (via facsimile 803-734-1499)