

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

Appeal from the Charleston County  
Court of Common Pleas  
Roger M. Young, Sr., Circuit Court Judge

Appellate Case No. 2024-001803

**RECEIVED**

**Jun 23 2025**

**SC Court of Appeals**

**RECEIVED**

**Nov 07 2025**

**SC Court of Appeals**

Harold Simmons, Appellant,

v.

City of North Charleston, Respondent.

**PROOF OF SERVICE FOR  
RESPONDENT'S FINAL BRIEF**

I certify that on the date listed below, I filed the foregoing document with the Supreme Court and served a copy on all counsel of record by emailing it to the following listed email addresses:

**South Carolina Court of Appeals:**

Clerk of Court - South Carolina Court of Appeals  
*ctappfilings@sccourts.org*

Emily Heid, Appeals Specialist I  
<*eheid@sccourts.org*>

**Counsel of Record:**

Thomas R. Goldstein  
Belk, Cobb, Infinger & Goldstein, P.A.  
P.O. Box 71121  
N. Charleston, SC 29415-1121  
843-729-0928

*Tommy Goldstein <tgoldstein@cobblaw.net>*  
**Attorney for Appellant Harold Simmons**

Kriston D. Neely, Esquire  
City of North Charleston  
PO Box 190016  
North Charleston, SC 29419  
*Kris Neely <kneely@northcharleston.org*  
**Attorney for City of North Charleston**

By: *s/David J. Parrish*  
David J. Parrish  
Maynard Nexsen PC  
**Attorney for Respondent**  
**City of North Charleston**  
June 23, 2025



**David J. Parrish**  
Shareholder  
Admitted in SC

June 23, 2025

**Via FedEx Overnight Delivery**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
**Jun 23 2025**  
**SC Court of Appeals**

**Re: Harold Simmons v. City of North Charleston,  
Appellate Case No.: 2024-001803**

Dear Ms. Kitchings:

Today I electronically filed the Final Brief of Respondent City of North Charleston in the above appeal, and at the same time, I emailed a copy of the Brief to all counsel of record in this appeal. In follow up to the electronic filing, enclosed for service by mail is one bound copy of the Brief (with a red cover).

Would you please let me know if I have overlooked anything or if you need anything else from me in connection with this matter.

All counsel of record in this case are copied on this letter.

With kind regards,

*David Parrish*

David J. Parrish

DJP/amj  
Enclosures

**RECEIVED**  
**Nov 07 2025**  
**SC Court of Appeals**

**cc via email only w/out enclosure:**

Tommy Goldstein <tgoldstein@cobblaw.net>

Kris Neely <kneely@northcharleston.org>

205 King Street  
Suite 400 (29401)  
PO Box 486  
Charleston, SC 29402  
www.maynardnexsen.com

**T** (843) 720-1771  
**E** DParrish@maynardnexsen.com  
Maynard Nexsen PC  
**Attorneys and Counselors at Law**



**David J. Parrish**  
Shareholder  
Admitted in SC

November 7, 2025

**Via FedEx (Tracking No.: 3950 9668 4195)**

Jenny Abbott Kitchings, Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201

**RECEIVED**  
**Nov 07 2025**  
**SC Court of Appeals**

**Re: Harold Simmons v. City of North Charleston,  
Appellate Case No.: 2024-001803**

Dear Ms. Kitchings:

Per the Court's letter dated November 6, 2025, enclosed please find six (6) bound copies of Respondent's Final Brief in the matter detailed above. Should the Court have any questions or concerns, please reach out to me directly at (843) 720-1771 or by way of email at [dparrish@maynardnexsen.com](mailto:dparrish@maynardnexsen.com).

All counsel of record in this case is copied on this letter.

With kind regards,

*David J. Parrish*

David J. Parrish

DJP/amj  
Enclosure(s)

**cc via email only w/out enclosure:**  
Tommy Goldstein <[tgoldstein@cobblaw.net](mailto:tgoldstein@cobblaw.net)>  
Kris Neely <[kneely@northcharleston.org](mailto:kneely@northcharleston.org)>