

Nov 12 2025

SC Court of Appeals



David J. Parrish
Shareholder
Admitted in SC

November 12, 2025

Via USPS First Class Mail and Email

Jenny Abbott Kitchings, Clerk of Court
South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201
ctappfilings@sccourts.org

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

Dear Ms. Kitchings:

I represent Respondent City of North Charleston (the “City”) in this appeal. In response to your November 10, 2025 letter requesting conflicts with the dates of potential oral argument in this appeal (copy of the letter is attached for ease of reference), I have a conflict on March 2, 3, and 5, 2026, based on a planned out of town vacation. Accordingly, I would greatly appreciate the Court not scheduling oral argument on those dates.

On a different subject, Kris Neely and I are the attorney’s representing the City in this appeal (we are the ones that filed the City’s briefs and the motions of records in this appeal), but the Court’s letters and notices regarding this appeal are still being sent solely to attorney Margie A. Pizarro, who is no longer representing the City in this appeal. **Would you please update the records for this appeal to reflect that Ms. Pizarro is no longer involved in this appeal and that Kris Neely and I are co-counsel for the City, so that Kris and I start receiving communications from the Court regarding this appeal.** Our contact information is:

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Please let me know 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

Enclosure

cc via email only w enclosure:

Tommy Goldstein <tgoldstein@cobblaw.net>

Kris Neely <kneely@northcharleston.org>

Margie A. Pizarro <margie@pizarrolawfirm.com>

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