The South Carolina Court of Appeals

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July 29, 2026

Harold Simmons
3042 North Carolina Avenue
Charleston SC 29403

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

Dear Mr. Simmons:

Upon reviewing your return to the motion to be relieved as counsel, the following deficiency or deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or your filing will not be considered:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

Jasmine D. Smith, Deputy

CLERK

cc: Thomas R. Goldstein, Esquire
David J. Parrish, Esquire
Kriston D. Neely, Esquire