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S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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

Appellate Case No. 2026-002021

Harold Simmons, Petitioner,

v.

City of North Charleston, Respondent.

PROOF OF SERVICE FOR RESPONDENT'S
RETURN TO PETITION FOR WRIT OF CERTIORARI

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

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November 2, 2026