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JAN 05 2015

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

S.C. Supreme Court

APPEAL FROM THE SOUTH CAROLINA COURT OF APPEALS  
Case No. 2013-000762

Richard Stogsdill,.....Petitioner,

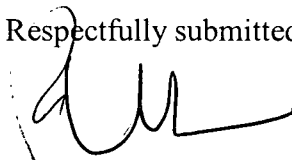
v.

South Carolina Department of  
Health and Human Services,.....Respondent.

**MOTION TO FILE CORRECTED  
PETITIONER'S REPLY TO RESPONDENT'S RETURN**

Petitioner received Respondent's Return on December 24, 2014, leaving only four working days to file Petitioner's Reply. In reviewing the Reply, counsel discovered errors which have been corrected. Petitioner respectfully requests permission to file the attached corrected Reply to Respondent's Return.

Respectfully submitted,



Patricia Logan Harrison, Esquire  
611 Holly Street  
Columbia, SC 29205  
803-256-2017  
Attorney for Petitioner

**THE STATE OF SOUTH CAROLINA  
In the Supreme Court**

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APPEAL FROM THE SOUTH CAROLINA COURT OF APPEALS  
Case No. 2013-000762

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S.C. Supreme Court

Richard Stogsdill,.....Appellant,

v.

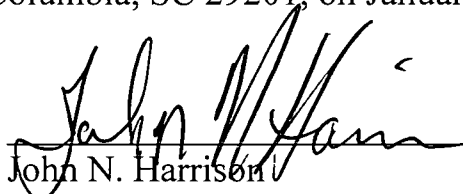
South Carolina Department of  
Health and Human Services,.....Respondent.

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Certificate of Service

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I, John N. Harrison, certify that I hand delivered the corrected *Petitioner's Reply to Return of Respondent* and the Motion to file the same in the above case to Richard G. Hepfer, Esq., Office of General Counsel, South Department of Health and Human Services, 1801 Main St, Columbia, SC 29201, on January 5, 2014.

  
\_\_\_\_\_  
John N. Harrison  
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803-256-2017

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January 5, 2015

HAND DELIVERY

The Honorable Daniel E. Shearouse  
Clerk, The South Carolina Supreme Court  
1231 Gervais Street  
Columbia, SC 29201

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JAN 05 2015

Re: Petitioners Reply to Return of Respondent  
Richard Stogsdill v. SCDHHS  
Appeal from the South Carolina Court of Appeals  
Case No: ~~2013-000762~~  
2014-062513

S.C. Supreme Court

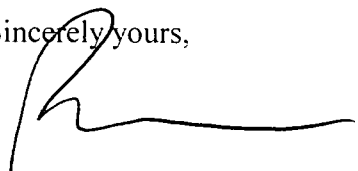
Dear Mr. Shearouse:

In reviewing the *Reply* we filed last week over the weekend, I discovered errors which have been corrected in the attached corrected *Reply*. I apologize for the inconvenience. Enclosed is the original, along with seven copies of the corrected *Reply*. The exhibits (provided to the Court pursuant to Rule 201 of the Rules of Evidence [judicial notice rules]) have not been reproduced. Can the copies of those included with the original *Reply* be attached to the Corrected *Reply*, or will we need to provide another set?

Also enclosed is the original and seven copies of a Motion to file a corrected reply along with a check for \$25.00. A Certificate of Service for both the Motion and the corrected *Reply* is enclosed also. Please clock the copy of this letter and the Certificate of Service plus a copy of the Motion and the *Reply*.

Thank you for your assistance in this matter.

Sincerely yours,

  
Patricia Logan Harrison

Enclosures

c: Richard G. Hepfer, Esq. Sarah Garland St. Onge, Esq. Philip J. Corson, Esq.  
Anna Maria Darwin, Esq. Kirby Mitchell, Esq. Stephen Suggs, Esq.