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March 4, 2015

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Columbia, South Carolina 29201

Subject: • Carl Eugene Berry v. Jess T. Reichardt and Thomas H. Reichardt  
• Case Tracking # 2014-001588  
• Request for Submission, Without Oral Argument

Dear Ms. Kitchings,

This letter is the Appellants' response to the 02/23/2015 letter, with above Subject, submitted by the counsel of record for Respondent.

The Appellant is uncertain of the Respondent's purpose in requesting the absence of Oral Argument. However, the Appellants appreciate this opportunity to present their opinion on the possible need for oral argument.

The Respondent owns hundreds of acres in Saluda County and most likely receives a substantial pension from the SC Education System. Comparing the Respondent's "quality of retirement" with the financial position of the Appellants, is a study of contrasts. Appellant, Thomas H. Reichardt, is 51 years old, 100% disabled and in poor health. Appellant, Jess T. Reichardt, is unemployed and has an education that ended after the 9<sup>th</sup> grade.

The Appellants have no objection to an oral argument, if the Court is of the opinion that oral argument would be an aid in "resolving the issues presented in the Appeal".

Sincerely yours,



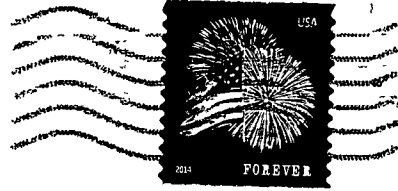
Philip H. Woolhiser  
Attorney for Appellants

PW/mw

cc: Richard L. Whitt, Esquire, Jefferson D. Griffith, III, Esquire

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