

September 17, 2015

RECEIVED

SEP 21 2015

SC Court of Appeals

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RE: Loud v. Short, Appellant Case No. 2015-001853

Dear Madam Clerk:

As directed by the Court, the Appellants previously submitted a memorandum in support of the Court's jurisdiction over the appeal from the Trial Court's order denying their motion to amend their answer to assert a statute of limitations defense under S.C Code Ann. §14-3-330, because it involves the merits, affects their substantial rights, and effectively strikes out an affirmative defense. The Respondents submitted a Reply Memorandum citing to an unpublished opinion in *Southern Sales and Marketing Group, Inc. v. Amco Construction Co., Inc.*, Op. No. 2006-UP-278 (S.C.Ct.App., filed June 13, 2006). The Appellants would respectfully request that the Court note that unlike the trial court's discretionary ruling in *Southern Sales*, the Trial Court's ruling in this case rests solely on the merits on a question of law which brings it within the jurisdiction of §14-3-330.

Sincerely,



Deborah H. Sheffield

cc:

John Eric Fulda

Whetstone, Perkins & Fulda

P. O. Box 8086

Columbia, South Carolina 29202

David L. Savage

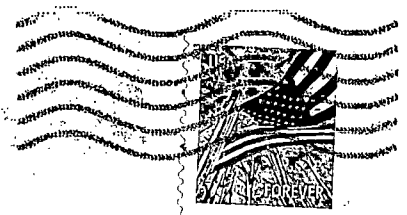
Savage Law Firm

P.O. Box 912

Charleston, SC 29402

Hood Law Firm, LLC
172 Meeting Street
Charleston, SC 29401

COLUMBIA SC 290
18 SEP 2015 PM 3 L



The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

SEP 21 2015

SC Court of Appeals

29211162929

