

THE MACE FIRM

ATTORNEYS AT LAW

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RUSSELL W. MACE III, ESQ
LIC.: FLORIDA, GEORGIA, NEW YORK, SOUTH CAROLINA

NICOLE N. MACE, ESQ
LIC.: FLORIDA, GEORGIA, SOUTH CAROLINA

AMY K. RAFFALDT, ESQ
LIC.: SOUTH CAROLINA

REPLY TO:

SC Court of Appeals

THE MACE FIRM
1341 44TH AVENUE N., SUITE 205
MYRTLE BEACH, SC 29577
843.839.2900
843.839.2913 FAX

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

October 14, 2015

VIA FAX: (803) 734-1839
and U.S. MAIL

RE: Maxine Taylor v. Heirs of William Taylor, et al.
Appellate Case No.: 2015-000342

Dear Ms. Kitchings:

I am in receipt of your letter dated October 13, 2015 regarding a possible deficiency in the submission of Defendants' Exhibits #3 and #4 in our Notice of Separate Filing Pursuant to Rule 210(f) of the South Carolina Appellate Court Rules. Specifically, your letter states that these exhibits were not reflected in the Designation of Matter filed on July 13, 2015. These exhibits were submitted to the lower court at the July 29, 2013 hearing. They were reflected on page 2 of the Designation of Matter as "Defendants' Exhibit #3, Sketch" and "Defendants' Exhibit #4, Depiction of Lot 9."

While reviewing the Designation of Matter, counsel did notice a typographical error showing the above-mentioned exhibits appearing under "July 29, 2012 Hearing." Such was an error and counsel has enclosed a modified Designation of Matter to reflect "July 29, 2013 Hearing." There was not a hearing held on July 29, 2012 and no exhibits were introduced during that time. The transcripts described in the Designation of Matter properly indicated "July 29, 2013," which is where Defendants' Exhibit #3, Sketch and Defendants' Exhibit #4, Depiction of Lot 9 were introduced. This is confirmed on page 33 in the Record on Appeal. I apologize for the error.

Please let me know if you need any further information so that I may remedy any deficiency. Thank you.

MIAMI

305.532.3636

1210 WASHINGTON AVE., SUITE 245

MYRTLE BEACH

843.839.2900

1341 44TH AVENUE N., SUITE 205

Sincerely,



Amy K. Raffaldt, Esq.

Enclosures

cc: George H. O'Kelley, Jr., Esq.

MIAMI

305.532.3636

1210 WASHINGTON AVE., SUITE 245

MYRTLE BEACH

843.839.2900

1341 44TH AVENUE N., SUITE 205

THE MACE FIRM

ATTORNEYS AT LAW

1341 44TH AVENUE NORTH, SUITE 205
MYRTLE BEACH, SOUTH CAROLINA 29577

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