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MAY 20 2016

SC Court of Appeals

D. ALAN LAZENBY
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May 18, 2016

The Honorable Jenny Abbott Kitchings
Clerk of Court for Court Of Appeals
PO Box 11629
Columbia SC 29211-1629

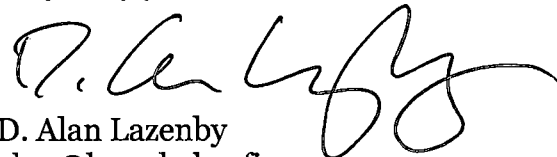
Re: *Harris v. Tietex International Ltd.*
In the Court of Common Pleas for Spartanburg County
C.A. No: 2011-CP-42-4538
Appellate C.A. No: 2014-00902

Dear Ms. Kitchings:

I am writing to respond to your May 11, 2016, correspondence concerning your request for an amended record on appeal. I note in reviewing the file that pages 62, 71, 72, 86, and 87 of Mr. Harris' March 14, 2013, deposition transcript were in fact presented to the trial court. I attach a copy of Plaintiff's Memorandum in Opposition to Defendant's Motion for Summary Judgment which was filed on August 30, 2013. Page 13 of this Memorandum specifically references the above-cited deposition pages and attaches them as an exhibit. During the argument on the renewed Motion for Summary Judgment, I specifically referenced page 13 of the Memorandum and the pages cited therein in my argument to the trial court. (R. p. 556 l. 22 - p. 557 l. 3). As such, I believe these pages are properly part of the record on appeal in this case.

Please let me know if you need any additional information from me.

Very truly yours,



D. Alan Lazenby
alan@lazenbylawfirm.com

DAL: je
Enclosure
cc: Fred Suggs, Esq. (without enclosure)

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