

THE STATE OF SOUTH CAROLINA
In the Supreme Court

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APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

S.C. Supreme Court

L. Casey Manning, Circuit Court Judge

Case No. 2011-CP-40-7854

Appellate Case No. 2012-21-2125

John S. RaineyAppellant,

v.

Nimrata "Nikki" R. HaleyRespondent.

REPLY MEMORANDUM
IN SUPPORT OF MOTION TO STRIKE

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Graham L. Newman
M. David Scott
Christopher P. Kenney
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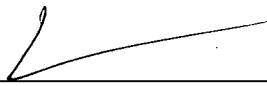
ATTORNEYS FOR JOHN S. RAINEY, APPELLANT

Columbia, South Carolina
November 1, 2012

Appellant respectfully replies to Respondent's memorandum in opposition to Appellant's motion to strike Respondent's counsel's letter to the Clerk dated October 24, 2012.

Appellant has not raised any new issues in his Reply memorandum, but has merely demonstrated the constitutional infirmity of accepting Respondent's position. Having now availed herself further of the opportunity to make additional, improper argument after the close of briefing, Respondent's memorandum in opposition to Appellant's motion to strike should also be struck from the record.

Respectfully submitted by,



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CERTIFICATE OF SERVICE

I, Beth Craft, paralegal to the attorney for Appellant John S. Rainey, Richard A. Harpootlian, P.A., with offices at 1410 Laurel Street, Post Office Box 1090, Columbia, South Carolina 29202, certify that on November 1, 2012, served by E-MAIL & U.S. MAIL, the following document to the below mentioned person(s):

Document: Reply Memorandum in Support of Motion to Strike.

Served: Kevin Hall, Esquire
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November 1, 2012
VIA HAND DELIVERY

Daniel E. Shearouse
CLERK OF COURT
Supreme Court Building
1231 Gervais Street
Columbia, South Carolina 29201

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S.C. Supreme Court

In re: John S. Rainey vs. Nikki R. Haley

Dear Mr. Shearouse:

Enclosed please find for filing the original and eight (8) copies of the following:

- 1) Reply Memorandum in Support of Motion to Strike.

I would appreciate you filing the enclosed and forwarding the clocked copies to my courier.

By copy of this letter, I am serving opposing counsel with a copy of the same.

With warm personal regards, I am

Sincerely,


Richard A. Harpootlian

/sec

Enclosure

cc: VIA E-MAIL & U.S. MAIL
Kevin Hall, Esquire
Karl "Butch" Smith Bowers, Jr, Esquire
M. Todd Carroll, Esquire