

IN THE STATE OF SOUTH CAROLINA
COURT OF APPEALS

FROM THE SOUTH CAROLINA COURT OF COMMON PLEAS

Honorable Renee Allyson Lee, Judge

Case No.: 2016-000491

RECEIVED
NOV 28 2016
SC Court of Appeals

Crystal Faye Clark APPELLANT

v.

Housing Authority of the City of Columbia RESPONDENT

RETURN TO RESPONDENT'S SECOND AMENDED MOTION TO DISMISS

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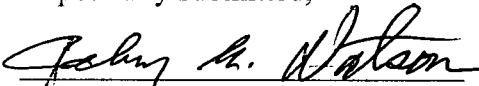
*Counsel for Appellant,
Crystal Faye Clark*

ARGUMENT IN REPLY TO RESPONDENT'S MOTION TO DISMISS

1. **The Appellant has filed all of the documents required in this case for the Court to consider this appeal and rule on its merits.**
2. **It is the policy of this Court that cases be heard on the merits and not dismissed due to technical, non-meritorious reasons.**
3. **The Respondent has not always filed documents as required by the rules without requestings to have the time extended in this appeal.**
4. **The Respondent has not been prejudiced by any delays in filings by the Appellant.**

Respectfully submitted,

BY:



Johnny E. Watson,
Attorney for Appellant,
Crystal Faye Clark

Columbia, South Carolina

Dated: November 28, 2016

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CERTIFICATE OF SERVICE

I, Johnny E. Watson, Attorney for the Appellant Crystal Faye Clark, hereby certify that I have served the individuals named below with a copy of the documents described herein by hand delivery or by depositing them in the U. S. Mail, postage prepaid, addressed as follows::

PERSONS SERVED: Mr. Kenneth A. Davis
 Boykin, Davis & Smiley, LLP
 220 Stoneridge Drive, Suite 100
 P. O. Box 11844
 Columbia, South Carolina 29211

And

Honorable Jenny A. Kitchings
Clerk of Court
S. C. Court of Appeals
1545 Sumter Street
Columbia, S. C. 29201

DOCUMENT: Final Brief of the Appellant, Final Reply Brief of the Appellant, Return to Respondent's Second Amended motion to Dismiss.

DATE SERVED: November 28, 2016



Johnny, Document Server

Columbia, South Carolina

Date: November 28, 2016