



The South Carolina Court of Appeals

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January 31, 2017

Harold Simmons, Jr.
1182 King St.
Charleston SC 29403

Re: Allen Livingston v. Harold Simmons
Appellate Case No. 2016-001201

Dear Mr. Simmons:

Upon reviewing your appellant's initial brief and designation of matter, the following deficiencies have been noted under the South Carolina Appellate Court Rules (SCACR), and must be corrected within ten (10) days of the date of this letter or your appeal will be dismissed:

- The designation of matter is not accompanied by the required certificate of counsel.
- The proofs of service have not been dated as required by Rule 267(b), SCACR.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jay A. Latigo".

CLERK

cc: Bruce Alan Berlinsky, Esquire