



The South Carolina Court of Appeals

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February 07, 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 further review of your appellant's initial brief and designation of matter, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and must be corrected on any future filings:

- The caption/title does not comply with Rule 267(a), SCACR. Specifically, The caption is reversed. The caption must instead read as follows:

Allen Livingston, Respondent,

v.

Harold Simmons, Appellant.

Very truly yours,

V. Claire Allen, Deputy

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cc: Bruce Alan Berlinsky, Esquire