



# The South Carolina Court of Appeals

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March 02, 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 designation of matter, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and has not yet been corrected. It must be corrected within ten (10) days of the date of this letter or your appeal will be dismissed:

- The document is not accompanied by the required certificate of counsel pursuant to Rule 209(c), SCACR.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jenny A. Kitchings". The signature is written in a cursive, flowing style.

CLERK

cc: Bruce Alan Berlinsky, Esquire