



# The South Carolina Court of Appeals

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CLERK

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May 19, 2017

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

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

Dear Counsel:

Pursuant to the Court's letter dated March 10, 2017, you must provide an update as to the status of the bankruptcy proceedings every 60 days from the date of the letter. Please provide and update to the Court within 10 days of the date of this letter.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Bruce Alan Berlinsky, Esquire