



# The South Carolina Court of Appeals

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April 03, 2018

Mr. Andrew James Toney, Esquire  
PO Box 5969  
Hilton Head Island SC 29938

Re: Shamsy Madani v. Rickey Phelps  
Appellate Case No. 2017-001761

Dear Counsel:

Upon reviewing your supplemental record on appeal, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and any deficiency must be corrected within ten (10) days of the date of this letter or your record will not be considered:

- The document is not accompanied by a certificate of counsel as required by Rule 210(g), SCACR.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Christopher Stephen Truluck, Esquire