

THE STATE OF SOUTH CAROLINA
South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

2018-001089

RECEIVED

FEB 28 2019

SC Court of Appeals

Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp,
Deville Kiez Simmons, Haroldett Uneke Simmons, and Glenn Simmons,
Plaintiffs,

Of whom Gwendolyn Brown, Deville Kiez Simmons, and Haroldett Uneke
Simmons are.....Appellants,

vs.

Housing Authority of the City of Charleston, South Carolina.....Respondent.

INITIAL BRIEF OF RESPONDENT

Mary Bass Lohr, Esquire
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Robert W. Achurch, Esquire
SC Bar No.: 064854
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Attorneys for Respondent

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PROOF OF SERVICE

I certify that I have served the Initial Brief of Respondent and Designation of Matter on Gwendolyn Brown, Deville Kiez Simmons, and Haroldett Uneke Simmons by depositing a copy of it in the United States Mail, postage prepaid, on February 12, 2019, addressed to their attorney of record, J. Seth Whipper, Esquire, Whipper Law Firm, Post Office Box 70070, North Charleston, SC 29415.

{Signature Page Follows}

HOWELL, GIBSON & HUGHES, P.A.

By: 

Mary Bass Lohr

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Beaufort, SC 29901-0040

(843) 522-2400

Attorney for Housing Authority of the
City of Charleston

Beaufort, South Carolina

February 25, 2019

HOWELL, GIBSON AND HUGHES, P.A.
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February 25, 2019

Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
Post Office Box 11629
Columbia, SC 29211

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FEB 28 2019

SC Court of Appeals

Re: Gwendolyn Brown, individually, and as natural guardian of Quintez Lee Sapp, Deville Kiez Simmons, Haroldett Uneke Simmons, and Glenn Simmons vs. Housing Authority of the City of Charleston, South Carolina
2014-CP-10-043
Civil Action No.: 2018-001089
Our File No: 11845 MBL

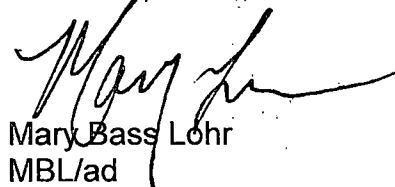
Dear Ms. Kitchings:

I am in receipt of the Court's correspondence dated February 21, 2019, in which there were some deficiencies in the Respondent's recent filing. Therefore, please find enclosed herewith for filing the corrected cover page for the *Initial Brief of Respondent* and a corrected *Proof of Service* with regard to the above referenced matter. I would appreciate your filing the same and returning a filed clocked copy to me in the enclosed self-addressed, stamped envelope provided for your convenience.

With kindest regards, I am

Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.

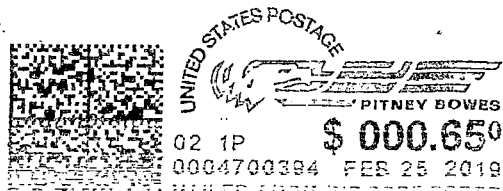


Mary Bass Lohr
MBL/ad
Enclosure

cc: J. Seth Whipper

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CHARLESTON
SC 294
25 FEB 19
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Hon. Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
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