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THE STATE OF SOUTH CAROLINA  
South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

2018-001089

**RECEIVED**  
APR 26 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.

MOTION TO AMEND RESPONDENT'S INITIAL BRIEF AND DESIGNATION OF MATTER

The Respondent, Housing Authority of the City of Charleston, South Carolina, respectfully requests leave to amend the Initial Brief of Respondent and the Respondent's Designation of Matter. It came to counsel's attention that some of the evidence included within the briefs was inadvertently left out of the record of the lower court. Therefore, the parties would request leave to amend their respective briefs and designation of matter to remove certain arguments not on record. This motion is made with the consent of the Appellants.

**{Signature Page Follows}**

HOWELL, GIBSON & HUGHES, P.A.

By: I. Buden for  
Mary Bass Lohr  
Post Office Box 40  
Beaufort, SC 29901-0040  
(843) 522-2400  
Attorney for Respondent

Beaufort, South Carolina

April 23, 2019

THE STATE OF SOUTH CAROLINA  
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Of whom Gwendolyn Brown, Deville Kiez Simmons, and Haroldett Uneke Simmons are.....Appellants,

vs.

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

PROOF OF SERVICE

I certify that I have served the Motion to Amend Respondent's Initial Brief 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 April 23, 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 for

Mary Bass Lohr  
Post Office Box 40  
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(843) 522-2400  
Attorney for Housing Authority of the  
City of Charleston

Beaufort, South Carolina

April 23, 2019

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JAMES S. GIBSON, JR \*  
Of Counsel

\* Certified Mediator

April 23, 2019

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

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APR 26 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  
Civil Action No.: 2018-001089  
Our File No: 11845 MBL

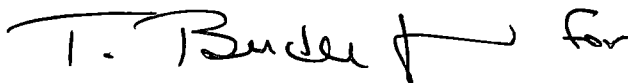
Dear Ms. Kitchings:

Please find enclosed herewith for filing an original and six (6) copies of a Motion to Amend Respondent's Initial Brief and Designation of Matter 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

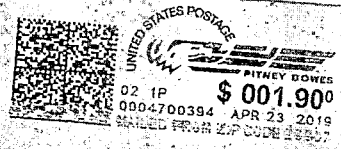
Yours truly,

HOWELL, GIBSON AND HUGHES, P.A.



Mary Bass Lohr  
MBL/ad  
Enclosure

cc: J. Seth Whipper



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Hon. Jenny Abbott Kitchings  
Clerk of Court  
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