

THE STATE OF SOUTH CAROLINA  
South Carolina Court of Appeals

**RECEIVED**  
JUL 11 2019  
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

2018-001089

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.

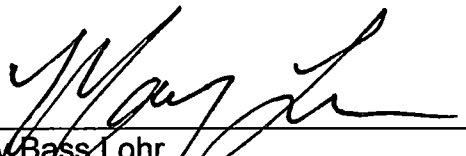
AMENDED DESIGNATION OF MATTER

The Respondent proposes the following to be included in the Record on Appeal:

- 1. Letter to the City of Charleston Housing Authority dated October 4, 2007

I certify that this designation contains no matter which is irrelevant to this appeal.

HOWELL, GIBSON & HUGHES, P.A.

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

Beaufort, South Carolina

July 8, 2019

THE STATE OF SOUTH CAROLINA  
South Carolina Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

2018-001089

**RECEIVED**  
JUL 11 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.

PROOF OF SERVICE

I certify that I have served the Amended Initial Brief of Respondent and Amended 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 July 8, 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  
Post Office Box 40  
Beaufort, SC 29901-0040  
(843) 522-2400  
Attorney for Housing Authority of the  
City of Charleston

Beaufort, South Carolina

July 8, 2019

HOWELL, GIBSON AND HUGHES, P.A.  
ATTORNEYS AT LAW

Post Office Box 40  
Beaufort, South Carolina 29901-0040  
www.hghpa.com

STEPHEN P. HUGHES  
PATRICK M. HIGGINS \*  
ROBERT W. ACHURCH III \*  
DAVID S. BLACK \*  
MARY BASS LOHR  
THOMAS A. BENDLE, JR.

WILLIAM H. COX, III  
NATHAN E. AKERS  
CATHERINE L. FLOEDER

JAMES S. GIBSON, JR \*  
Of Counsel

\* Certified Mediator

25 RUE DU BOIS  
LADY'S ISLAND  
BEAUFORT, SOUTH CAROLINA 29907

TELEPHONE: 843 - 522-2400  
FAX NUMBER: 843 - 522-2429  
WRITER'S DIRECT: 843-522-2425  
DIRECT E-MAIL: [mlohr@hghpa.com](mailto:mlohr@hghpa.com)  
PARALEGAL E-MAIL: [adarden@hghpa.com](mailto:adarden@hghpa.com)

July 8, 2019

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

RECEIVED  
JUL 11 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:

Please find enclosed herewith for filing *Amended Initial Brief of Respondent* and *Amended 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



HOWELL, GIBSON & HUGHES, P.A.  
Attorneys at Law  
Post Office Box 40  
Beaufort, SC 29901-0040

---

TO:

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

---

**RECEIVED**  
JUL 11 2019  
SC Court of Appeals

