

# WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL\*\*  
TRACEY C. GREEN  
CHAD N. JOHNSTON  
ELIZABETH ZECK\*  
ELIZABETHANN L. CARROLL  
JOHN W. ROBERTS  
R. WALKER HUMPHREY, II\*\*\*  
ANDREW R. HAND\*\*\*\*  
J. JOSEPH OWENS

ELIZABETH S. MABRY  
J. PATRICK HUDSON  
OF COUNSEL

JOSEPH H. FARRELL, III  
SPECIAL COUNSEL

\*ALSO ADMITTED IN TEXAS  
\*\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*\*ALSO ADMITTED IN CALIFORNIA  
\*\*\*\*ALSO ADMITTED IN NORTH CAROLINA

October 14, 2019

## VIA HAND DELIVERY

The Honorable Daniel E. Shearouse  
Clerk of Court  
South Carolina Supreme Court  
1231 Gervais Street  
Columbia, South Carolina 29201

# RECEIVED

OCT 14 2019

S.C. SUPREME COURT

RE: City of Myrtle Beach, For Itself and a Class of Similarly Situated Plaintiffs, Respondents, v. Horry County, Appellant;  
Appellate Case No. 2019-001134

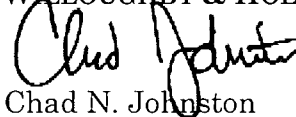
Dear Mr. Shearouse:

Enclosed for filing and pursuant to Rules 209, 210, 240 and 263(b), of the South Carolina Appellate Court Rules, Respondent City of Myrtle Beach, for Itself and a Class of Similarly Situated Plaintiffs, ("City") respectfully submits the original and seven (7) copies of both its **Reply in Support of its Motion to Strike Appellant Horry County's Designation of its Confidential Trial Brief as a document to be included in the Record on Appeal.**

By copy of this letter, I am serving counsel for Appellant and enclose a certificate of service to that effect. I would appreciate your acknowledging receipt of this request by file-stamping the extra copy of the filing and returning it to me via our courier. If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.



Chad N. Johnston

#### OFFICES:

COLUMBIA | 930 RICHLAND STREET, COLUMBIA, SC 29201 | 803.252.3300 FAX 803.256.8062  
CHARLESTON | 133 RIVER LANDING DRIVE, SUITE 200, CHARLESTON, SC 29492 | 843.619.4426 FAX 843.619.4490

The Honorable Daniel E. Shearouse

October 14, 2019

Page 2 of 2

---

cc: Henrietta U. Golding, Esquire (via U.S. Mail)  
James K. Gilliam, Esquire (via U.S. Mail)  
Adam R. Artigliere, Esquire (via U.S. Mail)  
W. Grayson Lambert, Esquire (via U.S. Mail)