



# The South Carolina Court of Appeals

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November 26, 2019

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Re: Bank of New York v. Janet Smith  
Appellate Case No. 2019-000983

Dear Counsel:

Upon reviewing your respondent's final brief, 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 brief will not be considered:

- The document is not accompanied by the required certificate of counsel.

Very truly yours,

*V. Claire Allen, Deputy*  
CLERK

cc: Jon A. Ozolins, Esquire