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THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Edgar W. Dickson, Circuit Court Judge

RECEIVED

JAN 27 2020

SC Court of Appeals

APPELLATE CASE NO.: 2019-001255

Wendy Reed Appellant,

v.

County of Dorchester and Thomas Limehouse Respondents.

MOTION TO AMEND COUNTY OF DORCHESTER'S RESPONSE BRIEF

Respondent County of Dorchester filed its initial response brief in this matter on December 23, 2019 and respectfully request that it be allowed to amend the response brief to include citation and argument of the S. C. Court of Appeals opinion, *Halsey v. Simmons*, Op. No. 5712 (S.C. Ct. App. filed January 22, 2020) (Shearouse Adv. Sh. No. 4 at 22). The opinion addresses issues applicable to this matter currently before the Court.

Respectfully Submitted



Jonathan J. Anderson
SC Bar # 383
Anderson Reynolds & Stephens, LLC
37 ½ Broad Street
P.O. Box 87
Charleston, SC 29401
(843) 723-0185 –phone
*Attorney for Respondent, County of
Dorchester*

January 24, 2020

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**RESPONDENT COUNTY OF DORCHESTER'S PROOF OF SERVICE OF MOTION
TO AMEND RESPONSE BRIEF**

I hereby certify that on January 24, 2020, I served a copy of Respondent's Motion to Amend County of Dorchester's Response Brief on the following:

Nancy Bloodgood, Esquire
242 Mathis Ferry Road, Suite 201
Mt. Pleasant, SC 29464
Attorney for Appellant

And

Thomas Limehouse
PO Box 2005
Summerville, SC 29848
Pro Se Defendant

by placing a copy of said documents in the United States mail with sufficient postage thereon.

[Signature on following page]

ANDERSON REYNOLDS & STEPHENS, LLC

Felicity Moore

Felicity Moore, Paralegal

37 ½ Broad Street

P.O. Box 87

Charleston, SC 29401

(843) 723-0185 –phone

January 24, 2020
Charleston, South Carolina

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January 24, 2020

VIA US MAIL

The Honorable Jenny Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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SC Court of Appeals

RE: Wendy Reed v. County of Dorchester and Thomas Limehouse
Appellate Case Number: 2019-001255

Dear Ms. Kitchings:

Please find enclosed our firm's check in the amount of \$50.00, the originals, and six (6) copies each of the following:

- 1) Motion to Amend County of Dorchester's Response Brief and
- 2) Proof of Service of Respondent County of Dorchester's Motion to Amend Response Brief.

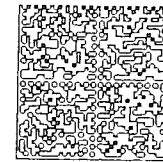
Please contact me if you require additional information at this time. I am

Sincerely yours,


J.J. Anderson

JJA/fjm
Enclosures

cc: Nancy Bloodgood, Esquire
Thomas Limehouse



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