



# The South Carolina Court of Appeals

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February 20, 2020

Harold Simmons, Jr.  
3042 North Carolina Avenue  
North Charleston SC 29405

Re: Allen Livingston v. Harold Simmons  
Appellate Case No. 2016-001201

Dear Mr. Simmons:

Upon reviewing your motion for extension of time to provide the record on appeal corrections, 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:

- A proof of service has not been provided. You must serve and file a proof of service substantially in the format shown by Form 7 in Appendix C to part II of the SCACR.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Bruce Alan Berlinsky, Esquire