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March 16, 2020

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

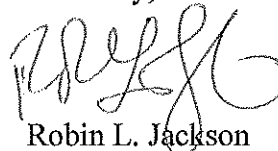
RE: White v. City of North Charleston
Case No.: 2017-001930

Dear Madame Clerk:

I just received notice from your office that the oral argument in above referenced matter, which was scheduled for on March 17, 2020, was cancelled. I am writing now to bring the following supplemental authority to the Court's attention: *Palmer v. State of South Carolina*, 427 S.C. 36 (Ct. App. 2019)(the "South Carolina Constitution does not provide for monetary damages for civil rights violations and the legislature has not enacted an enabling statute"). This case had not been ruled on when the final briefs were submitted, and I had planned to address it with the court tomorrow.

With kindest regards, I am,

Sincerely,



Robin L. Jackson

RLJ/mos
cc: Milt Stratos, II., Esquire