



# The South Carolina Court of Appeals

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March 25, 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 amended record on appeal 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 appeal will be dismissed:

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

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Bruce Alan Berlinsky, Esquire