



The South Carolina Court of Appeals

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V. CLAIRE ALLEN
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May 13, 2020

Mr. Bruce Alan Berlinsky, Esquire
PO Box 206
Charleston SC 29402-0206

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

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 may not be considered:

- Exhibits cannot be attached to your brief. They must be included in the Record on Appeal. If the Record on Appeal does not include the documents that you listed in your designation of matter, a motion to supplement the record on appeal will need to be served and filed.

Very truly yours,

V. Claire Allen

CLERK

cc: Harold Simmons, Jr.