



# The South Carolina Court of Appeals

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August 20, 2020

Ms. Brooke Ann Payne, Esquire  
PO Box 2449  
Mt. Pleasant SC 29465

Re: Barry Adickes v. Philips Healthcare (2)  
Appellate Case No. 2019-001141

Dear Counsel:

Upon reviewing your appellants' final brief, the following deficiency has been noted under the South Carolina Appellate Court Rules (SCACR), and this 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,

  
CLERK

cc: William L. Smith, II, Esquire  
James David George, Jr., Esquire