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OCT 15 2020

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Alex Kinlaw, Jr., Circuit Court Judge

Appellate Case No. 2019-001941

Bank of America, N.A.

Respondent

v.

Janie C. Southern,

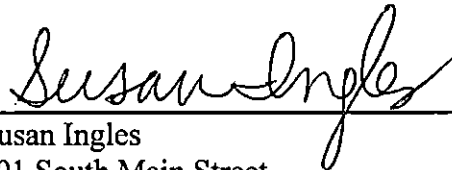
Appellant

PROOF OF SERVICE

I certify that I have served the following documents on Bank of America, N.A. by depositing a copy in the United States Mail, postage prepaid, on October 12, 2020, addressed to its attorney S. Louis Schiappa, Cooling & Winter, LLC, 220 N. Main St., Suite 500 Greenville, South Carolina 29601:

FINAL BRIEF OF APPELLANT
FINAL REPLY BRIEF OF APPELLANT

October 12, 2020



Susan Ingles
701 South Main Street
Greenville, South Carolina 29601
(864) 679-3244
susaningles@sclegal.org
Attorney for Appellant



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SC Court of Appeals

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www.sccourt.org | www.lawhelp.org/sc | www.probono.net/sc

October 12, 2020

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201-3726

RE: Bank of America, N.A., Respondent v. Janie C. Southern, Appellant
Appellate Case No. 2019-001941

Dear Ms. Kitchings:

Enclosed for filing in the above referenced case are one of each of the following:

- 1) Final Brief of the Appellant
- 2) Final Reply Brief of the Appellant
- 3) Proof of Service

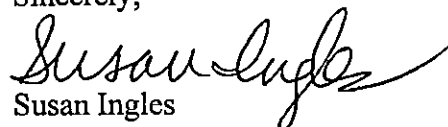
In the process of complying with Rule 211(b), I discovered that a citation is missing for the following reference on Page 14 of the Final Brief of Appellant:

It should also be noted that "[a]n account stated implies some previous transaction or indebtedness between the parties."

The citation is *Meredith v. Fretwell*, 128 S.C. 268, 122 S.E. 767 (1924). I have added that citation to the brief. However, let me know if I need to do anything else

I respectfully request oral argument in this case due to the novel question presented and the consequences if the Court were to affirm the trial court's decision. Please let me know if a motion is required for that request.

Sincerely,


Susan Ingles

Encl.
cc: S. Louis Schiappa





South Carolina
Legal Services
MEMBER OF THE SCALP OF JUSTICE
701 South Main Street
Greenville, SC 29601

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