

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY

MASTER-IN-EQUITY LAW COURT

Mikell R. Scarborough, Master-In-Equity Law Judge

Case No. 2016-001201

Allen Livingston.....Respondent

v.

Harold Simmons Jr.....Appellant

MOTION TO AMEND

Regarding filed Initial Brief and Appellant Brief

I, the Appellant, Harold Simmons, Jr am not asking to amend the Final Brief. I am requesting permission to amend the Initial Brief and Appellant Brief (CASE NO. 2014-CP-10-1635 of August 11, 2016 Statement of the Cases) before submission of the Final Brief which has been delayed due to the pandemic and death in my family. There is additional information that is vital to the Appellant CASE NO. 2016-001201 which is supported by Rule 224(c)3 Affidavits. This amend is what the facts in the Record of Appeal rely upon to support the motion.

Appellant thanks you for your patience,

Harold Simmons, Jr.

January 29, 2021

Harold Simmons, Jr., Pro Se
3042 North Carolina Ave.
North Charleston, SC 29405
(843) 480-8694

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PROOF OF SERVICE

I, Harold Simmons JR., Pro Se, hereby certify that I have served the Motion to Amend on Allen Livingston by depositing a copy of it in the United States Main, on January 29, 2021, addressed to his attorney of record, Bruce A. Berlinsky, P.A., One Carriage Lane Bldg. F, Charleston, SC 29407.

January 29, 2021

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