



# The South Carolina Court of Appeals

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March 03, 2021

Harold Simmons, Jr.  
3042 North Carolina Avenue  
North Charleston SC 29405

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

Dear Counsel:

Upon reviewing your appellant's final brief and final reply 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 appeal will be dismissed:

- The document is not accompanied by the certificate of counsel required by Rule 211, SCACR.

Very truly yours,

*V. Claire Allen*

CLERK

cc: Bruce Alan Berlinsky, Esquire