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RECEIVED

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SC Court of Appeals

VIA EMAIL

The Hon. Jenny Abbott Kitchings
Clerk of Court, Court of Appeals of South Carolina
1220 Senate Street
Columbia, South Carolina 29201

**Re: The Homestead Property Owners Assn., Inc. v. Wanda J. Miller, et al.
Appellate Case No. 2018-001577**

Dear Ms. Kitchings:

I represent the appellants in the above-referenced appeal, and I write to provide a supplemental citation pursuant to Rule 208(b)(7), SCACR, that citation being to the South Carolina Supreme Court's decision in Winrose Homeowners' Ass'n, Inc. v. Hale, 428 S.C. 563, 837 S.E.2d 47 (2019), in which the Court went out of its way to address homeowners' association lien foreclosure practices that were essentially the same as those involved in this case. This decision supports the appellants' argument concerning their abuse of process counterclaim, as the Supreme Court in that opinion has already observed that the practices at issue are abusive. Id. at 573-74.

Thank you for your attention in this matter. Of course, if you or other court personnel have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am,

Very truly yours,
HARRISON, RADEKER & SMITH, P.A.

A handwritten signature in blue ink, appearing to read 'A. S. Radeker', written over a light blue horizontal line.

Andrew S. Radeker

ASR/

cc: George C. James, III, Esq.
Heath M. Stewart, III, Esq.
Stephanie Trotter Kellahan, Esq.