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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Alison Renee Lee, Circuit Court Judge

Case No. 2018-002155

The Housing Authority of the City of Charleston

Respondent

v.

Katrina Brown

Appellant

**JOINT MEMORANDUM
IN RESPONSE TO THE COURT'S MAY 26, 2021 LETTER**

By letter dated May 26, 2021, this Court requested memoranda from the parties addressing whether Appellant Katrina Brown still lives in her apartment at the Charleston Housing Authority, and if not, why this appeal is not moot.

The parties have conferred and agree that Appellant still lives in her apartment at the Charleston Housing Authority. As a result, the parties submit that this appeal is not moot.

SOUTH CAROLINA APPLESEED LEGAL JUSTICE CENTER

June 1, 2021

s/ Adam Protheroe

By: Adam Protheroe, S.C. Bar No. 78442

P.O. Box 7187

Columbia, SC 29202

(803) 779-1113 ext. 106

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s/ Thomas B. Pritchard

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PROOF OF SERVICE

I certify that I have served the **JOINT MEMORANDUM IN RESPONSE TO THE COURT'S MAY 26, 2021 LETTER** on the following counsel of record by email on June 1, 2021.

Thomas B. Pritchard
Jacqueline Dixon Phillips
Parker Nelson & Associates
211 King St. Suite 107
Charleston, SC 29401

SOUTH CAROLINA APPLESEED LEGAL JUSTICE CENTER

June 1, 2021

s/ Adam Protheroe

By: Adam Protheroe, S.C. Bar No. 78442
P.O. Box 7187
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From: [Adam Protheroe](#)
To: [Thomas Pritchard](#); [Jacqueline Dixon](#); [Teddy Parker](#)
Cc: matthewbillingsley@sclegal.org
Bcc: "[CityofChasHAvBrown](#)"
Subject: HACC v. Brown
Date: Tuesday, June 1, 2021 3:52:00 PM
Attachments: [2021_06_01 - Joint Memo re Court's May 26, 2021 Letter FINAL.pdf](#)
[2021_06_01 - Proof of Service.pdf](#)

Good Afternoon,

Pursuant to In Re Operation of the Appellant Courts During the Coronavirus Emergency, App. Order No. 2020-05-29-002, ¶(g)(3) (S.C. Sup. Ct. Filed May 29, 2020), attached for service upon you via email is the Joint Memorandum in Response to the Court's May 26, 2021 Letter, as well as a Proof of Service, being filed in the Court of Appeals this afternoon.

Kind Regards,
Adam Protheroe

Adam Protheroe
Litigation Attorney

S.C. Appleseed Legal Justice Center

P.O. Box 7187

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