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SC Court of Appeals

CERTIFICATE OF SERVICE

Pursuant to Section (d)(1) of the Supreme Court's Order RE: Methods of Electronic Filing and Service Under Rule 262 of the South Carolina Appellate Court Rules (dated August 25, 2021), the undersigned employee of Lindemann & Davis, P.A., counsel for the Respondent American Southern Insurance Company, does hereby certify that service of **Final Brief of Respondent** was made upon all counsel of record by email only this the 7th day of September 2021:

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s/ Andrew F. Lindemann
