

THE STATE OF SOUTH CAROLINA  
In the Supreme Court of South Carolina

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Dec 21 2021

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

S.C. SUPREME COURT

MIKELL R. SCARBOROUGH, MASTER IN EQUITY

Case No.: 2016-001201

Allen Livingston, Respondent,

v.

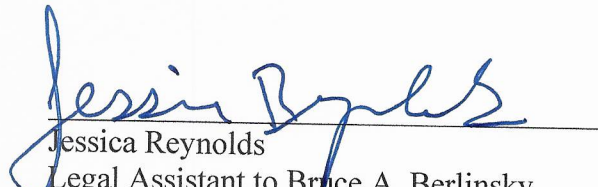
Harold Simmons, Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on this 21<sup>st</sup> day of December, 2021, she served the Appellant, pro se, with a copy of *Return to Petition for Writ of Certiorari* in this matter by mailing a copy of the same by United States Mail with first class postage prepaid to the following addresses:

Harold Simmons, Jr.  
3042 North Carolina Ave.  
North Charleston, SC 29405  
Appellant

Harold Simmons, Jr.  
1182 King Street  
Charleston, SC 29403  
Appellant

  
Jessica Reynolds  
Legal Assistant to Bruce A. Berlinsky  
Bruce A. Berlinsky, P.A.