

# The Supreme Court of South Carolina

Allen Livingston, Respondent,

v.

Harold Simmons, Petitioner.

Appellate Case No. 2021-001234

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## ORDER

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Respondent's motion to allow late filing of the return to petition for writ of certiorari is granted and the return is accepted as filed.

FOR THE COURT

BY Patricia A. Howard

CLERK

Columbia, South Carolina  
December 23, 2021

cc:  
Bruce Alan Berlinsky, Esquire  
Harold Simmons, Jr.