

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**SC Court of Appeals**

APPEAL FROM SPARTANBURG COUNTY  
Court of Common Pleas

Shannon M. Phillips, Master in Equity  
Gordon Cooper, Master in Equity

Appellate Case No. 2021-000880

Michael E. Williams,

Respondent

vs.

Raymond Arnold a/k/a Raymond Arnold, Jr.

Appellant.

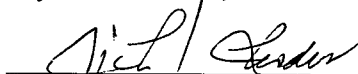
PROOF OF DELIVERY

This is to certify that on the 20<sup>th</sup> day of December, 2021, the undersigned, secretary to Richard H. Rhodes, Esq., served a copy of the **RESPONDENT'S FINAL BRIEF** by emailing and mailing a copy by U.S. First Class Mail to the following:

Jeffrey T. Spell, Esquire  
1721 Ashley River Road  
Charleston SC 29407  
Via Email: [jeff@jeffspell.com](mailto:jeff@jeffspell.com)

  
JO ANN CHAMPION

SWORN to before me this 20  
day of December, 2021

 (SEAL)  
NOTARY PUBLIC FOR SOUTH CAROLINA

My Commission Expires: 12-10-2025

BURTS TURNER & RHODES  
ATTORNEYS AT LAW

SAM BURTS (1907 - 1982)  
NOEL TURNER (1928 - 2011)  
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December 20, 2021

The Honorable Jenny Abbott Kitchings  
Clerk, The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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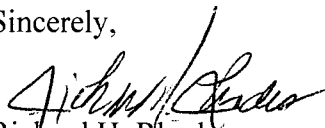
Re: Michael E. Williams, Respondent  
vs.  
Raymond Arnold a/k/a Raymond Arnold, Jr., Appellant  
Appellate Case No.: 2021-000880

Dear Ms. Kitchings:

I have enclosed an original unbound copy and one bound copy of the Respondent's Final Brief together with a Certificate of Counsel. I have also enclosed Proof of Service on counsel for the Appellant.

If I need to supply additional information, please let me know.

Sincerely,



Richard H. Rhodes

RHR/jc  
Enc.

cc: Jeffrey T. Spell, Esquire  
1721 Ashley River Road  
Charleston SC 29407  
Via Email: [jeff@jeffspell.com](mailto:jeff@jeffspell.com) and U.S. Mail

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SC Court of Appeals

BURTS TURNER & RHODES  
ATTORNEYS AT LAW  
260 NORTH CHURCH STREET  
SPARTANBURG, SOUTH CAROLINA 29306

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TO:

The Hon. Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia SC 29211

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