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Dec 21 2021

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

MIKELL R. SCARBOROUGH, MASTER IN EQUITY

Case No.: 2016-001201

Allen Livingston, Respondent,

v.

Harold Simmons, Appellant

RETURN TO PETITION FOR WRIT OF CERTIORARI

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

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

Bruce A. Berlinsky, P.A.
One Carriage Ln., Bldg. F
Charleston, SC 2907
(843) 852-2202

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ARGUMENT

Appellants Petition for Writ of Certiorari should be denied pursuant to Rule 242(b) in that (1) There is no novel question of law; (2) there is no dissent in the decision of the Court of Appeals; (3) the decision of the Court of Appeals is not in conflict with a prior decision of the Supreme Court; (4) there are no substantial constitutional issues directly involved; (4) the decision of the Court of Appeals does not conflict with a decision of the United States Supreme Court.

Based on the foregoing, the Petition for Writ of Certiorari should respectfully be denied.

Respectfully submitted,

s/Bruce A. Berlinsky
BRUCE A. BERLINSKY, PA
Bruce A. Berlinsky, Esquire
One Carriage Lane, Bldg. F
Charleston, SC 29407
(843) 852-2202
Attorney for Respondent

December 15, 2021

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CERTIFICATION

The undersigned certifies that this Return to Petition for Writ of Certiorari contains no matters which are irrelevant to the Appeal.

Respectfully submitted,

s/Bruce A. Berlinsky

BRUCE A. BERLINSKY, PA

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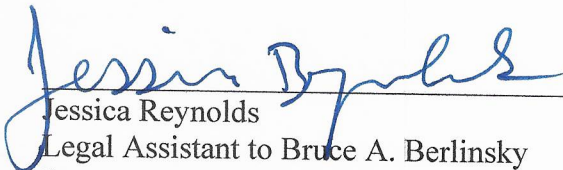
Harold Simmons, Appellant.

PROOF OF SERVICE

The undersigned hereby certifies that on this 21st 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.