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**Jan 18 2022**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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APPEAL FROM HORRY COUNTY  
Court of Common Pleas

Honorable Benjamin H. Culbertson, Circuit Court Judge  
Civil Action No.: 2018-CP-26-6424

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Appellate Case No. 2021-000393

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**South Carolina Electric & Gas Company, Respondent,**

**v.**

**Barbara Todd,**

**Landowner,**

**and**

**Public Service Authority; Pitch Landing, LLC; and David O. Heniford, Jr., Other  
Condemnees,**

**of which Pitch Landing, LLC is the Appellant.**

**AND**

**South Carolina Electric & Gas Company, Respondent,**

**v.**

**Pitch Landing, LLC, Appellant,**

**and**

**South Carolina Public Authority; Horry Telephone Cooperative; Grand Strand Water  
and Sewer Authority; Coastal Carolina National Bank; Billy J. McDowell & Sally R.  
McDowell; Bobby D. McDowell, Other Condemnees.**

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**CERTIFICATE OF COUNSEL**

I, Gregory M. Alford, attorney for the Respondent, South Carolina Electric & Gas Company, do hereby certify that **Respondent's Final Brief** complies in all material respects with Rule 211 SCACR.

Respectfully submitted this 18th day of January 2022.

**ALFORD LAW FIRM, LLC**

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