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March 11, 2022

RECEIVED

Mar 11 2022

SC Court of Appeals

Served via email and Hand Delivery
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street, Columbia, SC 29201

Re: Joe Jefferson vs. SC Department of Transportation
Appellate Case No.: 2019-001643

Dear The Honorable Ms. Kitchings:

At the beginning of January 2022, Ms. Erica Starnes, Esquire, left our law firm. Based on the same, I received a phone call from Ms. LaToyla Burns at the Court instructing me to file a Motion for Substitution of Counsel, and further instructing me to electronically file amended copies of Appellants' Final Brief, Appellants' Reply Brief, and the Record on Appeal. Specifically, I was told to file copies of the previously submitted briefs, but to change the caption on the cover pages to include my name and contact information and provide updated Certificates of Counsel for all filings. My Motion for Substitution of Counsel was granted pursuant to an Order from the Court of Appeals dated January 24, 2022.

Thereafter, I received correspondence from the Court dated March 8, 2022, instructing all parties to file six (6) copies of the record on appeal and all final briefs. Pursuant to all of the instructions referenced above, enclosed please find, for electronic filing, the amended copies of Appellants' Final Brief, Appellants' Reply Brief, and the Record on Appeal. In addition, I will submit the requested six (6) bound copies of the same via hand delivery to the Court.

I sincerely thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact my office.

With kindest regards,

WILLSON JONES CARTER & BAXLEY, P.A.

John Gabriel Coggiola

JGC/jgc

Enclosures

cc: Mr. Stephen J. Wukela, Esquire (via email)
Ms. Traci Brunson (via email)