

Jayne LaForge Stovall, Appellant

v

Paulette B. Stovall and William S. Stovall, Defendants
Of whom Paulette B. Stovall is the Respondent

Appellate Case No. 2021-001504
South Carolina Court of Appeals

RECEIVED

Mar 20 2023

SC Court of Appeals

MOTION TO RECONSIDER AND RESCIND ORDER FILED March 16, 2023

After review of the Court's Order, copy attached, Appellant respectfully asks the Court to review, reconsider and rescind the Order. Appellant's motion to reinstate the appeal cannot be construed as a petition for Rehearing for the following reasons:

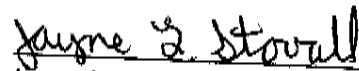
1. The Court erred stating that Appellant's Motion to reinstate the Appeal should be considered a petition for rehearing. The initial hearing of the case was never held to Appellant's knowledge. If such a review/hearing took place, Appellant was never notified prior to it, nor was she asked to return the matter/evidence to be included in the Record on Appeal. This evidence was returned to Appellant by Clerk Claire Allen in her letter of July 14, 2022, copy attached to this motion.
2. The Court erred in stating it was unable to find that any material fact or principle of law had been overlooked or disregarded. Appellant's points and authorities cited in both the original and then again in the emended briefs were clearly and correctly referenced.
3. In order for an Appellant or Plaintiff to meet the standard of burden of proof, evidence is to be evaluated by the Court. The evidence Appellant submitted has evidently not been looked at or evaluated by this court.
4. Because hearings in the Greenville courts were conducted via Zoom and no court reporters were present, numerous mistakes were made in procedure. Recordings were altered, redacted, or conveniently missing entirely. However, witnesses to these hearings have submitted affidavits to support this statement.

Motion to Reconsider and Rescind Order, Appellate Case No. 2021-001504

5. Both the Respondent Paulette Stovall and defendant William Stovall are guilty of perjury which is also confirmed by the evidence that was submitted but not reviewed by the court. Defendant William Stovall recently sent a letter to the Court asking that his name be removed from the Appeal and any further litigation.

Appellant respectfully requests that the Court rescind the Order of March 16, 2023 and proceed with proper notification of a hearing/review of the case.

Respectfully submitted,



Jayne LaForge Stovall

Pro Se Appellant

Copies to:

Devon Puriefoy, Attorney
William Stovall

CERTIFICATE OF SERVICE

I, Jayne LaForge Stovall, certify that on this date, March 21, 2023, copies of my Motion To Reconsider and Rescind the Order filed on March 16, 2023 by the Court to Respondent Paulette Stovall and Defendant William Stovall for whom Paulette Stovall is also Respondent via the U. S. Postal Service as follows:

Devon M. Puriefoy, Attorney
Truluck Thomason LLC.
3 Boyce Avenue
Greenville, S. Carolina 29601

William Stovall
1305 North King James Lane
Liberty Lake ,Washington 99019

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Jayne L. Stovall

Jayne L. Stovall
3197 Golden Oak Ct.
Dallas, Texas 75234
Appellant Pro Se



The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS
CLERK

V. CLAIRE ALLEN
CHIEF DEPUTY CLERK

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July 14, 2022

Jayne L. Stovall
3197 Golden Oak Ct.
Dallas TX 75234

Re: Jayne LaForge Stovall v. Paulette B. Stovall
Appellate Case No. 2021-001504

Dear Ms. Stovall:

The Court is in receipt of your documents that you included with your designation of matters. These documents were to only be listed in the designation of matter and are to be included in the record on appeal. Your documents are being returned to you. Please submit them in the record on appeal when it is due.

Very truly yours,

V. Claire Allen
CLERK

Enclosure

cc: Devon Marc Puriefoy, Esquire

*Jayne
These are the
documents they
are all copies
to send as is*

January 27, 2023

TO: Jenny Abbott Kitchens, Clerk, SCCA

FROM: Jayne LaForge Stovall

RE: Appellate Case No.2021-001504

Yesterday, I received three separate letters in one envelope from Claire Allen. The first was to Dr. Stovall stating no further action will be taken to amend the caption of the appeal. I assume he was asking that he be removed as Defendant. The second letter was to notify me and Devon Puriefoy that the remittitur will be sent as provided by Rule 221(b) of the South Carolina Appellate Court Rules. The third was the Order granting Respondent's Motion to Dismiss, stating that I failed to file an amended initial brief that complies with the court's order of September 29, 2022. This new Order was filed on January 23, 2023.

The Emended Initial Brief was submitted and received by the Court on October 17, 2022, well ahead of the October 31, 2022 deadline. I had included the documents listed in my original Designation of Matters. These documents were returned to me on July 14, 2022 by Claire Allen, stating they should be submitted "in the record on appeal when it is due". There was no indication from your office that there was a problem with the emended brief. The only problem seems to be Mr. Puriefoy's claims that items in my briefs were or are irrelevant to the case, which is absolutely not true. He is doing everything he can to avoid an audit and accounting of what has happened to the assets in the two trusts my father established of which I was co-trustee and am still the beneficiary.

Please advise as to what the Court is going to do, if anything, or if I need to file another Motion to reinstate my appeal. Otherwise, I will have to file a suit for Breach of Trust and Theft.

Jayne LaForge Stovall

Cc: Devon Marc Puriefoy

EAGLE POSTAL



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FAX

To: LaTayla Burns

Fax: 1-803-734-1839

Date: 03-20-23

Re: motion

From: Jayne Stovall

Fax: _____

Phone: _____

Cc: _____

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