

**RECEIVED**

**Jan 23 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
Court of Common Pleas Court

Hon. G.D. Morgan, Jr.  
Circuit Court Judge

Case No. 2025-CP-46-04007

Dennis Floyd Bivens, APPELLANT

v.

York County by and through Joshua Edwards, York County Manager; Josh Reinhardt, York County Development Services Manager; and Jonathan Buono, York County Planning and Development Services Director, RESPONDENTS

---

NOTICE OF APPEAL

---

Dennis Floyd Bivens hereby gives Notice of Appeal of the January 16, 2026 order of the Hon. G.D. Morgan, Jr. dismissing Biven's case Under Rule 12 SCRPC. Appellant would respectfully show this court the trial court erred in construing "zoning compliance verification" as lawful zoning change, and erroneously viewed facts and law most favorably to the movant. Bivens is seeking reversal of the trial court's order granting dismissal under Rule 12(b)(1) – Rule 12(b)(6) of the South Carolina Rules of Civil Procedure.

Respectfully submitted,

HALFORD LAW FIRM, LLC

*/s/. J. Cameron Halford*

J. Cameron Halford

Post Office Box 172

Barwnell, South Carolina 29812

803-524-8659

e-mail: [cam@halfordlaw.net](mailto:cam@halfordlaw.net)

ATTORNEY FOR APPELLANT

January 22, 2026

**RECEIVED**

**Jan 23 2026**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

APPEAL FROM YORK COUNTY  
Court of Common Pleas Court

Hon. G.D. Morgan, Jr.  
Circuit Court Judge

Case No. 2025-CP-46-04007

Dennis Floyd Bivens, APPELLANT

v.

York County by and through Joshua Edwards, York County Manager; Josh Reinhardt, York County Development Services Manager; and Jonathan Buono, York County Planning and Development Services Director, RESPONDENTS

---

CERTIFICATE OF SERVICE  
NOTICE OF APPEAL

---

The undersigned here certifies that the Notice of Appeal was filed and served by electronic filing, digital delivery and U.S. mailing January 22, 2026 addressed as follows:

**Chad N. Johnson, Esq.**  
Burr & Forman Law Firm  
1221 Main Street  
Columbia, South Carolina 29201  
803-799-9800  
e-mail: [cjohnson@burr.com](mailto:cjohnson@burr.com)  
ATTORNEYS FOR YORK COUNTY

HALFORD LAW FIRM, LLC  
*/s/ J. Cameron Halford*  
J. Cameron Halford, Esq.  
Post Office Box 172  
Barwnell, South Carolina 29812  
803-524-8659  
e-mail: [cam@halfordlaw.net](mailto:cam@halfordlaw.net)  
ATTORNEY FOR APPELLANT

January 22, 2026

**J. CAMERON HALFORD**

---

95 Allen Street  
Post Office Box 172  
Barnwell, South Carolina 29812  
(803) 619-4177

**RECEIVED**

**Jan 23 2026**

**SC Court of Appeals**

January 23, 2026

VIA E-MAIL ONLY

South Carolina Court of Appeals  
Hon. Jenny Kitchings  
1220 Senate Street,  
Columbia, South Carolina 29201

Re: Notice of Appeal – Case No. 2025-CP-46-04007  
Dennis Floyd Bivens vs. York County, by and through  
Joshua Edwards, York County Manager, Josh Reinhardt,  
York County Development Services Manager, and Jonathan  
Buono, York County Planning and Development Services  
Manager

Dear Mrs. Kitchings:

Please find enclosed for filing the below listed items in the above appeal. Please return file stamped copies. The filing fee and hardcopies will follow by U.S. mail. Opposing counsel in this case is copied. Thank you for your assistance.

With regard, I remain

Respectfully,

*/s./ J. Cameron Halford*  
J. Cameron Halford

Enclosure/attachments

1. Notice of Appeal Case No. 2025-CP-46-04007
2. Exhibit-A (Orders) 24 pages
3. Certificate of Service

cc: Chad N. Johnson, Esq. (email and US mailing 1/23/2026)  
cc: Michael Kendree (email and US mailing 1/23/2026)