

THE STATE OF SOUTH CAROLINA

COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY

COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS, JR.

---

Case No. 2013-CP-10-7203

Appeal Case No. 2014-001907

Nationwide Property & Casualty

Insurance Company, Plaintiff/Appellant

V.

Gary McCombs, Ragan McCombs and Robert G Albertt,

Defendants/Respondents

**Petition to Reinstate Appeal**

Comes now Appellant in the above styled matter and for  
it's Petition to Reinstate the appeal states:

1. Appellant filed this appeal on September 2, 2014.
2. The notice of appeal was amended on September 3, 2014.
3. The transcript was ordered on September 3, 2014 as  
indicated by the letter attached as exhibit 1.

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**SC Court of Appeals**

4. Appellant had been provided the incorrect court reporter information from the clerk of court and the correct court reporter was contacted on September 15, 2014 as indicated by exhibit 2.
5. The appellate court requested a copy of the complaint filed in the case and a copy was provided on September 16, 2014. See Exhibit 3.
6. On September 29, 2014, the court requested copy of proof of ordering the transcript. Counsel for appellant did not receive this correspondence. See Exhibit 4.
7. The transcript has been ordered and received. See Exhibit 5.

Wherefore, Appellant requests this court reinstate the appeal.

Respectfully Submitted this 10 Day of Nov. 2014, by:

BY:   
TRACE DILLON  
Bar No. 16857  
Attorney for Appellant  
THE DILLON LAW FIRM PC  
1130 Hurricane Shoals Rd  
Suite 600  
Lawrenceville, GA 30043  
(770) 513-6400 (Office)  
(770) 513-6577 (Facsimile)

**Exhibit 1**

Trace Dillon, Esq.  
Admitted to GA, SC & TN  
Bars

**THE DILLON LAW FIRM, PC**  
ATTORNEYS AT LAW

1130 Hurricane Shoals Rd  
Suite 600  
Lawrenceville, GA 30043

Toll Free (855) 591-0067  
Facsimile (770) 513-6577  
trace@dillonlawfirmpc.com  
www.dillonlawfirmpc.com

September 3, 2014

**VIA FIRST CLASS MAIL**

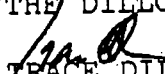
Sharon L. Vizer  
P.O. Box 4413  
Johns Island, SC 29457

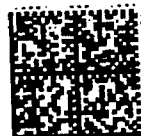
RE: NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY  
VS. GARY MCCOMBS  
RAGAN MCCOMBS ALBERT  
Our File No.: 13001448  
Civil Action Number: 2013CP1007203

Dear Ms. Vizer:

I have filed an appeal in the above matter and need to order the transcript. Please advise the cost and any thing else I need to do to get the transcript done and filed. Thanks for your help. My cell phone is [REDACTED]

Should you have any questions, please feel free to call.

Sincerely yours,  
THE DILLON LAW FIRM PC  
  
TRACE DILLON



**Exhibit 2**

Trace Dillon, Esq.  
Admitted to GA, SC & TN  
Bars

**THE DILLON LAW FIRM, PC**  
ATTORNEYS AT LAW

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trace@dillonlawfirmpc.com  
www.dillonlawfirmpc.com

September 15, 2014

**VIA FIRST CLASS MAIL**


Ruth Mott  
PO Box 2012  
Goose Creek, SC 29445

RE: NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY  
VS. GARY MCCOMBS  
RAGAN MCCOMBS ALBERT  
Our File No.: 13001448  
Civil Action Number: 2013CP1007203

Dear Ms. Mott:

I have filed an appeal in the above matter and need to order the transcript. I have been advised that you were the Court reporter. Please advise what arrangements need to be made to order this transcript. My cell phone is [REDACTED] if you have any questions. Enclosed is a copy of the Order.

Should you have any questions, please feel free to call.

Sincerely yours,  
THE DILLON LAW FIRM PC  
  
TRACE DILLON

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**SC Court of Appeals**



**Exhibit 3**

Trace Dillon, Esq.  
Admitted to GA, SC & TN  
Bars

**THE DILLON LAW FIRM, PC**  
ATTORNEYS AT LAW

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Lawrenceville, GA 30043

Toll Free (855) 591-0067  
Facsimile (770) 513-6577  
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www.dillonlawfirmpc.com

September 16, 2014

**VIA FIRST CLASS MAIL**  
CLERK OF COURT,  
P.O. Box 11629  
Columbia, SC 29201

RE: NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY  
VS. GARY MCCOMBS  
RAGAN MCCOMBS ALBERT  
Our File No.: 13001448  
Civil Action Number: 2013CP1007203

Dear Clerk:

Pursuant to your request, please find a copy of the Summons  
and Complaint.

Should you have any questions, please feel free to call.

Sincerely yours,  
THE DILLON LAW FIRM PC

  
TRACE DILLON

Enclosure

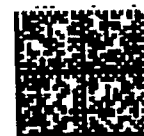


Exhibit 4



## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1015 SUMTER STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
www.sccourts.org

September 29, 2014

Mr. Trace M. Dillon, Esquire  
The Dillon Law Firm P.C.  
1130 Hurricane Shoals Road Suite 600  
Lawrenceville GA 30044

Re: Nationwide Property v. Gary McCombs  
Appellate Case No. 2014-001907

Dear Counsel:

Our records reflect that the time for ordering the transcript has expired. Within ten days of the date of this letter, you must file a copy of the letter showing that you have ordered the transcript directly from the court reporter, along with a motion requesting permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules. Your appeal will be dismissed if no motion is made within ten days of the date of this letter.

Very truly yours,

*V. Claire Allen, Deputy*

CLERK

cc: Andrew Steven Halio, Esquire  
Robert Rhett Sansbury, III, Esquire  
Helen Faith Hiser, Esquire

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**SC Court of Appeals**

**Exhibit 5**

THE STATE OF SOUTH CAROLINA

COURT OF APPEALS

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APPEAL FROM CHARLESTON COUNTY

COURT OF COMMON PLEAS

HONORABLE R. MARKLEY DENNIS, JR.

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Case No. 2013-CP-10-7203

Appeal Case No. 2014-001907

Nationwide Property & Casualty  
Insurance Company, Plaintiff/Appellant

V.

Gary McCombs, Ragan McCombs and Robert G Albertt,  
Defendants/Respondents

**Certificate of Service**

This is to certify that I have this day served a copy  
of the foregoing Petition to Reinstate and Transcript by  
U.S. Mail, sufficient postage prepaid and addressed as  
follows:

Andrew Halio, Esq.  
Law Office of Halio & Halio  
68 1/2 QUEEN STREET  
CHARLESTON, SC 29401

Helen F. Hiser  
Robert Rhett Sansbury  
735 Johnnie Dodds Blvd, Suite 200  
P.O. Box 650007  
Mount Pleasant SC 29465  
Robert Rhett Sansbury, III

Dated this 10 day of Nov, 2014.

BY: 70  
TRACE DILLON  
Bar No. 16857  
Attorney for Appellant  
THE DILLON LAW FIRM PC  
1130 Hurricane Shoals Rd  
Suite 600  
Lawrenceville, GA 30043  
(770) 513-6400 (Office)  
(770) 513-6577 (Facsimile)

Trace Dillon, Esq.  
Admitted to GA, SC & TN  
Bars

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ATTORNEYS AT LAW

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Toll Free (855) 591-0067  
Facsimile (770) 513-6577  
trace@dillonlawfirmpc.com  
www.dillonlawfirmpc.com

November 10, 2014

**VIA FEDERAL EXPRESS**


Clerk of Court of Appeals  
1015 Sumter Street  
Columbia SC 29201

RE: NATIONWIDE PROPERTY & CASUALTY INSURANCE COMPANY  
VS. GARY MCCOMBS  
RAGAN MCCOMBS ALBERT  
Our File No.: 13001448  
Appeal Case Number: 2014-001907

Dear Clerk:

Enclosed, please find our Petition to Reinstate the Appeal  
with the \$25.00 motion fee and 6 copies.

Should you have any questions, please feel free to call.

Sincerely yours,  
THE DILLON LAW FIRM PC  
  
TRACE DILLON

cc: Andrew Steven Halio  
Robert Rhett Sansbury, III  
Helen Faith Hiser

**RECEIVED**

NOV 12 2014

**SC Court of Appeals**

