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December 16, 2014

Clerk of Court  
The South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

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DEC 17 2014

Re: 21st Mortgage Corp. v. Youmans, et.al., No. 2011-CP-03-127  
Appellate Case No. 2013-001844

**SC Court of Appeals**

Dear Ms. Kitchings,

Youmans received 21st Mortgage's letter to you dated December 15, 2014 and disagrees with its reading of the appellate rules.

Rule 208(b)(7) allows a party to cite authority that the citing party considers significant enough to bring to the Court's attention. The Court decides how significant the authority is once it is brought to the Court's attention.

Rule 208(b)(7) also allows a party to state reasons for the citation and refer to the issue to which the citation pertains. Youmans's letter about *Buist v. Buist*, Op. No. 27468 (S.C. Sup.Ct. filed December 3, 2014)(Shearouse Adv.Sh. No. 49 at 61), does not cross this line.

Lastly, Rule 218(a) is not a license to raise new issues at oral argument, in a reply brief, or for the first time on appeal.

Still, Youmans has no objection if 21st Mortgage wants to submit a fuller response on *Buist*. If the Court grants leave, Youmans asks 21st Mortgage to please cite where in the record -- or in its opening brief -- that it mentioned the constitution or how to construe S.C. Code Ann. § 37-2-404(1).

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Chief Judge Few and Judges Thomas and Lockemy heard the appeal.  
Youmans again asks that *Buist* be brought to their attention.

My highest regards,



Robert Hill

cc: Mark B. Tinsley, Esq.  
Thomas E. Lyden, Esq.

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