

THE MOORE LAW FIRM, LLC

Of Charleston

June 6, 2017

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

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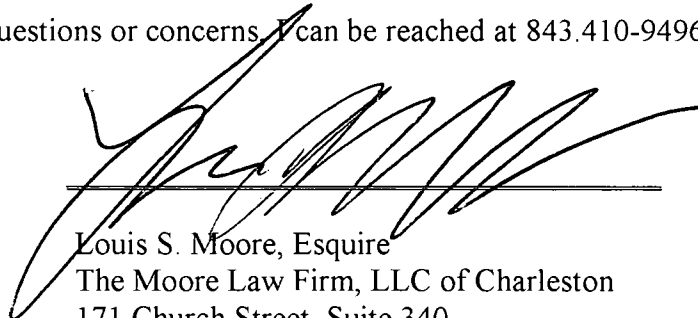
SC Court of Appeals

RE: Adrian Smalls, Respondent vs Brenda Lee Barnett, Appellant,
Case No. 2016-000100
Petition for Rehearing of Denial of Motion to Reinstate Appeal

Dear Ms. Kitchings:

Enclosed please find Appellant's Reply to Respondent's Return to Appellant's Petition as referenced above.

If you have any added questions or concerns, I can be reached at 843.410-9496 or 443.469-4635.



Louis S. Moore, Esquire
The Moore Law Firm, LLC of Charleston
171 Church Street, Suite 340
Charleston, South Carolina 29401
(843) 410-9496

Other Counsel of Record:

Kevin D. Hackler, Esquire
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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Court of Common Pleas

Thomas L. Hughston, Circuit Court Judge

2015-CP-18-1308

Adrian Smalls,

Respondent,

v.

Brenda Lee Barnett,

Appellant.

APPELLANT'S PETITION
FOR REHEARING
ON DENIAL OF REINSTATEMENT

NOW COMES undersigned counsel and submits the foregoing Petitioner for Rehearing on Denial of Reinstatement.

The grounds for the same are prevailing and have merit, to wit:

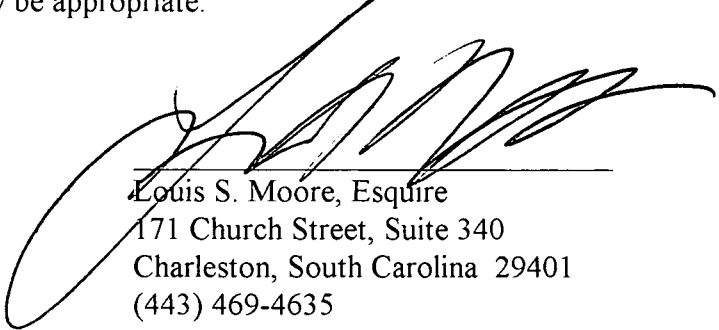
- a) Rule 240 affords Appellant the opportunity to submit the foregoing petition.
- b) Rule 221(a) and (c) Affords Appellant the right of rehearing where the Court's decision rendered was with finality.
- c) As per Rule 260, Appellant need only show good cause for Reinstatement. Appellant verily believes that good cause was demonstrated to the extent Appellant's counsel had prevailing circumstance that were preemptive in perfecting the appeal.

- d) No prejudice would obtain against Respondent who would have opportunity to defend against the Appeal as reinstated.

WHEREFORE, undersigned counsel prays this court will grant relief to the Petitioner by:

1. Issue an Order to Rehear the Dismissal of Appellant's Peition.
2. For such other relief as may be appropriate.

Submitted by:
This 6th Day of June, 2017.



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Attorney for Appellant

Other Counsel of Record:
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Thomas L. Hughston, Circuit Court Judge SC Court of Appeals

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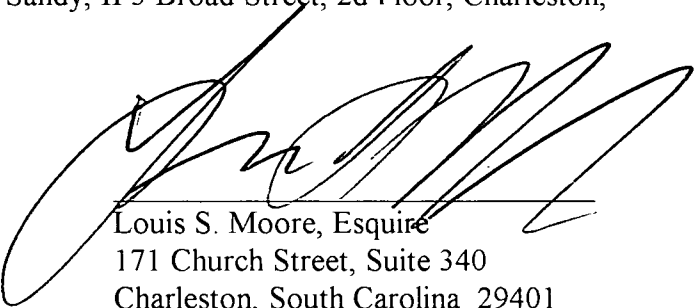
Brenda Lee Barnett,

Appellant.

PROOF OF SERVICE

I certify that I have served the foregoing APPELLANT'S PETITION FOR REHEARING ON DENIAL OF MOTION FOR REINSTATMENT upon the Respondent by depositing a copy of it in the United States Mail, postage prepaid, on 6th day of June 2017 addressed to his attorneys of record, Kevin D. Hackler and Theron W. Sandy, II 3 Broad Street, 2d Floor, Charleston, South Carolina 29401.

June 6, 2017.



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