

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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Bank of America, N.A. successor by merger to BAC  
Home Loans Servicing, LP f/k/a Countrywide Home  
Loans Servicing, LP, Respondent,

v.

Shawn L. Bethea and South Carolina Department of  
Motor Vehicles, Defendants,

Of whom Shawn L. Bethea is the Appellant.

**RECEIVED**

JUL 07 2017

SC Court of Appeals

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Appellate Case No. 2015-000985

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PETITION FOR REHEARING

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July 6, 2017

Shawn Bethea - Bey

Shawn Bethea-Bey, In Propria Persona

1317 Gordonville Court

Dillon, South Carolina 29536

*Appellant*

Pursuant to Rule 221(a), SCACR, Appellant respectfully Petitions this Court for a rehearing of its order dated June 28, 2017. Appellant submits that the Court improperly Affirmed the special referee's order granting summary judgment to Respondent. To Support the Petition,

Appellant submits the Following:

- (1) On the record of appeals, you will find in the testimony case transcript on pages 38- 60, I Shawn Bethea was not allowed to provide my evidence to support my case to the special referee, nor did the special referee allow my witness Attorney Green to testify on my behalf, and provide the court with supporting evidence. Attorney Green was subpoena correctly and a copy of that can be found on page(s) 61-63 on the record of appeals, and he was properly served to testify on my behalf.
- (2) On the record of appeals on page 99-100 you will find a hand written letter from my closing attorney, Mr.Steven G. Mikell stating that he never had the certificate of title to the mobile home switched over into my name and my lean holders' name which at the time was The Citizens Bank, And my question is , How was the loan satisfied into my name without the proper paper work being done by my closing attorney and The Citizens Bank.
- (3) You will find on the court of appeal record pages 160-161 shows that The Department of Motor Vehicles title search proves that the certificate of title was never switched into my name by my closing attorney, Mr.Steven G. Mikell. I, Shawn Bethea respectfully asked the court to reconsider rehearing my case, because the magistrate judge was in his jurisdiction to rule on my case,and he was in compliance with the law section 29-15-10 of the South Carolina code of Laws for 1976 as amend, to make a nonbiased decision on my behalf, and that the court of appeal made an error on my appeal.

CERTIFICATE OF SERVICE

The undersigned Appellant Petition for Rehearing was served on the parties to this action by depositing a copy thereof in the United States Mail, first class, postage prepaid address to:

McGuire Woods LLP

Fifth Third Street

201 North Tryson Street

Suite 3000

Charlotte, NC 28202

Respondent

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This is the 6<sup>th</sup> day of July, 2017

X *Shawn Bethea-Bey*

Shawn L. Bethea-Bey