

THE STATE OF SOUTH CAROLINA  
In The South Carolina Court of Appeals

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APPEAL FROM ALLENDALE COUNTY  
Court of Common Pleas

Hon. R. Lawton McIntosh  
Circuit Court Judge

---

Case no. 2016-CP-03-00286

**RECEIVED**  
MAY 17 2019  
SC Court of Appeals

William Hunter Youmans, APPELLANT

vs.

Mark B. Tinsley and Diane E. Tinsley, RESPONDENTS

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AMENDED  
NOTICE OF APPEAL

---

Appellant William Hunter Youmans here files and serves Amended Notice of Appeal of the Orders of the Hon. Lawton R. McIntosh, presiding circuit judge, dated August 7, 2019; November 8, 2018; January 8, 2019; March 28, 2019 and April 8, 2019 respectively. The Orders are attached to the Notice of Appeal as Exhibit-A.

Respectfully submitted,

HALFORD NIEMIEC & FREEMAN, LLP  
*/s/ J. Cameron Halford*

---

J. Cameron Halford  
238 Rockmont Drive  
Fort Mill, South Carolina 29708  
803-547-6618  
803-547-6638 fax  
cam@fortmilllaw.com  
Attorney for Appellant

May 13, 2019

Other counsel of record:

Blake Hewitt, Esq.  
Bluestein Thompson Sullivan, LLC  
Post Office Box 7965  
1614 Taylor Street,  
Columbia, South Carolina 29201  
803-674-8817  
803-771-8097 fax  
blake@bluesteinattorneys.com  
Attorney for Respondents

Mark B. Tinsley, Esq.  
265 Barnwell Highway,  
Allendale, South Carolina 29810  
Respondent / Attorney for Respondents

H. Woodrow Gooding, Esq.  
Gooding & Gooding, P.A.  
265 Barnwell Highway,  
Allendale, South Carolina 29810  
Attorney for Respondents

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NOTICE OF APPEAL

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Appellant William Hunter Youmans here files and serves Amended Notice of Appeal of the Orders of the Hon. Lawton R. McIntosh, presiding circuit judge. The Orders are attached to the Notice of Appeal as Exhibit-A.

Respectfully submitted,

HALFORD NIEMIEC & FREEMAN, LLP  
*/s/ J. Cameron Halford*

---

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Attorney for Respondents

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265 Barnwell Highway,  
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Attorney for Respondents

THE STATE OF SOUTH CAROLINA  
In The South Carolina Court of Appeals

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APPEAL FROM ALLENDALE COUNTY  
Court of Common Pleas

Hon. R. Lawton McIntosh  
Circuit Court Judge

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Case no. 2019-000736

---

William Hunter Youmans, APPELLANT

vs.

Mark B. Tinsley and Diane E. Tinsley, RESPONDENTS

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SC Court of Appeals

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CERTIFICATE OF SERVICE  
AMENDED NOTICE OF APPEAL

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The undersigned attorney for Appellant hereby certifies that a copy of the Amended Notice of Appeal and Exhibit-A containing prior Orders of the trial court has been served upon opposing counsel of record by electronic delivery and by U.S. Mail, postage prepaid this 13<sup>th</sup> day of May, 2019.

Respectfully submitted,

HALFORD NIEMIEC & FREEMAN, LLP  
*/s/ J. Cameron Halford*

---

J. Cameron Halford  
238 Rockmont Drive  
Fort Mill, South Carolina 29708  
803-547-6618  
803-547-6638 fax  
cam@fortmilllaw.com  
Attorney for Appellant

SWORN to and subscribed before me

This 13 day of May, 2019.

*Jimmie Lauck*  
\_\_\_\_\_  
Notary Public for South Carolina

- My Commission Exp: 2-25-2026

THE STATE OF SOUTH CAROLINA  
In The South Carolina Court of Appeals

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APPEAL FROM ALLENDALE COUNTY  
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Hon. R. Lawton McIntosh  
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Case no. 2016-CP-03-00286

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CERTIFICATE OF SERVICE  
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The undersigned attorney for Appellant hereby certifies that a copy of the Amended Notice of Appeal and Exhibit-A containing all prior Orders of the trial court has been served upon opposing counsel of record by electronic delivery and by U.S. Mail, postage prepaid this 13<sup>th</sup> day of May, 2019.

Respectfully submitted,

HALFORD NIEMIEC & FREEMAN, LLP

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J. Cameron Halford  
238 Rockmont Drive  
Fort Mill, South Carolina 29708  
803-547-6618  
803-547-6638 fax  
cam@fortmilllaw.com  
Attorney for Appellant

SWORN to and subscribed before me  
This \_\_\_ day of May, 2019.

---

Notary Public for South Carolina  
My Commission Expires:

LAW OFFICES

HALFORD NIEMIEC & FREEMAN, L.L.P.

*A Registered South Carolina Limited Liability Law Partnership. Including  
Individually Owned Companies and Limited Liability Companies*

238 ROCKMONT DRIVE  
FORT MILL, SOUTH CAROLINA 29708

TELEPHONE: 803-547-6618

FACSIMILE: 803-547-6638

J. Cameron Halford ^  
Matthew R. Niemiec  
P. John Freeman  
Alford Haselden †  
James H. Owen, Jr. †  
Myron P. Boloyan †

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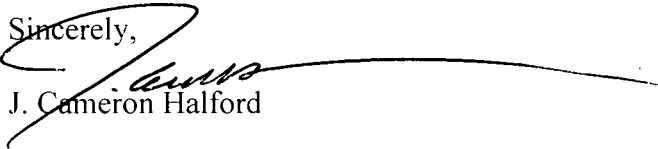
Amelia Smith

May 14, 2019

Page (2) of (2)

Please file a copy of the Amended Notice of Appeal and return a copy to me in the envelope provided. Thank you.

Sincerely,

  
J. Cameron Halford

JCH:tml

cc: Bill Hopkins (email only)

cc: Blake Hewitt (e-mail / U.S. Mail)

cc: H. Woodrow Gooding / Mark B. Tinsley (email / U.S. Mail)

attachments / enclosures

^ CERTIFIED MEDIATOR IN S.C. AND N.C. COURTS

† OF COUNSEL, INDEPENDENTLY OWNED AND OPERATED LAW OFFICE

• ASSOCIATE ATTORNEY HNF, LLP

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LAW OFFICES

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FORT MILL, SOUTH CAROLINA 29708

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SC Court of Appeals

May 14, 2019

South Carolina Court of Appeals  
Hon. Jenny Abbot Kitchings  
Attn: Amelia Smith  
Post Office Box 11629  
Columbia, South Carolina 29201

Re: Appellate Case No. 2019-000736 - William Hunter Youmans vs. Mark B.  
Tinsley - Amended Notice of Appeal

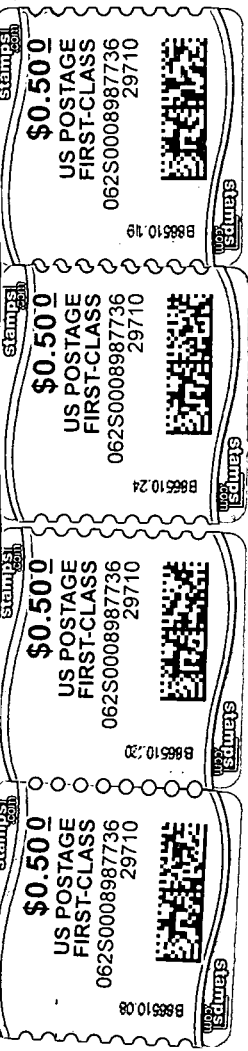
Dear Mrs. Smith :

Pursuant to the May 6, 2019 letter of the Court of Appeals, I am attaching the Amended Notice of Appeal, corrected proof of service, and attachment of prior orders of the trial court. Also attached is proof of the original and amended filing with the Allendale County Court of Common Pleas.

Pursuant to my telephone conversation with you last week, attorney Bill Hopkins is no longer involved in the case and can be removed as counsel of record. His representation ended upon dismissal of the third party complaint against me filed by respondent Mark Tinsley, which is documented in ¶(5) of the August 2, 2017 Order that is of record in the case below. Mr. Hopkins is copied. Attorney H. Woodrow Gooding and Respondent / attorney Mark B. Tinsley remain counsel of record.

^ CERTIFIED MEDIATOR IN S.C. AND N.C. COURTS  
† OF COUNSEL, INDEPENDENTLY OWNED AND OPERATED LAW OFFICE  
• ASSOCIATE ATTORNEY HNF, LLP

**Halford, Niemiec & Freeman, L.L.P.**  
**Attorneys at Law - J. Cameron Halford**  
**238 Rockmont Drive,**  
**Fort Mill, South Carolina 29708**



South Carolina Court of Appeals  
Jenny Abbott Kitchings  
Attn: Amelia Smith  
Post Office Box 11629  
Columbia, S.C. 29211

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