

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

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

Hon. R. Lawton McIntosh
Circuit Court Judge

Case no. 2016-CP-03-00286

William Hunter Youmans, APPELLANT

vs.

Mark B. Tinsley and Diane E. Tinsley, RESPONDENTS

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MAY 24 2019

SC Court of Appeals

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MOTION FOR EXTENSION OF TIME
SCACR 207 and SCACR 208

Appellant counsel respectfully motions the court for extension of deadline to Order transcription of the proceeding below before the Hon. R. Lawton McIntosh. Pursuant to instructions of the court Appellant counsel here attaches correspondence ordering the transcript and acknowledgement. Appellant respectfully seeks extension of deadlines for Order of the transcript and preparing of Initial Brief of Appellant.

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 21, 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
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blake@bluesteinattorneys.com
Attorney for Respondents

Mark B. Tinsley, Esq.
265 Barnwell Highway,
Allendale, South Carolina 29810
Respondent

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

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

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

Hon. R. Lawton McIntosh
Circuit Court Judge

Case no. 2019-000736

William Hunter Youmans, APPELLANT

vs.

Mark B. Tinsley and Diane E. Tinsley, RESPONDENTS

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MEMORANDUM IN SUPPORT OF
EXTENSION OF DEADLINE

The Appeal in this case will involve orders arising out of (4) hearings before the court of common pleas involving Form-4 and subsequent formal orders of the court, where all oral argument occurred before the trial judge from the dates of June 21, 2017 in Allendale County, through March 27, 2019 in Greenwood.

On March 27, 2019 the trial court heard and ruled upon Plaintiff's Motion to Reconsider with oral argument occurring in Greenwood, South Carolina by consent of all counsel. Counsel for Appellant has tendered letter ordering the transcript and acknowledgement of receipt as Exhibit-1 to this Motion. Prior to the Amended Notice of Appeal counsel had acquired all transcripts of record, except the last hearing occurring March 27, 2019 in Greenwood County.

WHEREFORE, Appellant Counsel respectfully moves for an extension of time in which to obtain the transcript pursuant to the documents attached in Exhibit-1.

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

Exhibit-#1

Appellant 5/21/2019

Motion for Enlargement of Time

(Order of Transcript)

Cheryl A. Smith, CVR-M

COPY

PO Box 80032
Simpsonville, SC 29680

E-mail: casmith@sccourts.org

**ACKNOWLEDGMENT OF RECEIPT OF
LETTER REGARDING TRANSCRIPT OF RECORD**

May 16, 2019

J. Cameron Halford
Halford Niemiec & Freeman, LLP
238 Rockmont Drive
Fort Mill, SC 29708

Via E-mail

RE: William Hunter Youmans v. Mark B. Tinsley, et.al
Case #2017-CP-03-00286

I am in receipt of your transcript request e-mailed to me on May 15, 2019, for the hearing held on the above case in Greenwood before Judge McIntosh. After reviewing my file, I have estimated that the transcript will be approximately 20 pages.

Rule 607 provides that the rate of \$4.25 shall be charged per page for a transcript. Based on the current rate, the estimated cost will be \$85.00 plus \$1.75 postage for a total of \$86.75. Upon receipt of your check in the amount of \$86.75, I will be able to place your request in line for production. If the transcript is less than 20 pages, I will refund the difference to you upon delivery of the transcript. If the transcript is more than 20 pages, the balance will be due prior to delivery of the transcript. Please make check payable to Cheryl Smith and mail to me at PO Box 80032, Simpsonville, SC 29680.

Under our rules, I have sixty days in which to complete the transcript after receipt of the deposit. In addition, I am allowed to request from Court Administration thirty-day extensions, if necessary, to complete the transcript. You will be notified if extensions are granted.

If you need the transcript sooner than the sixty days, you will need to order it expedited. The expedited rate is \$5.00 per page for a total of \$101.75 including postage. The expedited turnaround time is seven days.

If you desire to cancel the request for the transcript, a cancellation request must be made in writing. You will be responsible for payment of any portion of the transcript that has been completed.

Should you have any questions regarding the above information, please contact me at the below address. Thank you for your request in this matter.

Sincerely,

Cheryl A. Smith

Cheryl A. Smith
South Carolina Circuit Court Reporter
PO Box 80032
Simpsonville, SC 29680

Cc: transcripts@sccourts.org

LAW OFFICES

HALFORD NIEMIEC & FREEMAN, L.L.P.

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COPY

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

May 15, 2019

VIA EMAIL DELIVERY
CASMITH@SCCOURTS.ORG

Mrs. Cheryl Smith
Court Reporter
Post Office Box 882
Simpsonville, South Carolina 27680

Re: Case No. 2016-CP-03-00286 William Hunter Youmans vs.
Mark B. Tinsley and Diane Tinsley
Date of Hearing: March 27, 2019
Location: Greenwood, South Carolina
Judge: Hon. R. Lawton McIntosh

Dear Mrs. Smith :

I am writing to request a copy of the transcript in the above captioned matter heard before Judge McIntosh in Greenwood, South Carolina on March 27, 2019. Please provide the transcript under invoice to my offices. If you require advanced payment please advise and I will be happy to provide payment electronically or by check. Defense counsel is copied in the event they wish to request and pay for a copy of the transcript.

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

LAW OFFICES

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

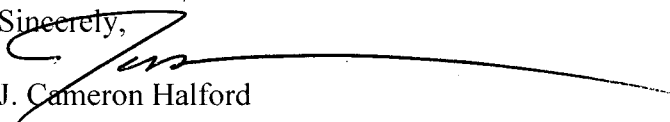
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Mrs. Cheryl Smith
May 15, 2019
Page (2)

Please kindly advise as to the above and the anticipated time you will need to produce the transcript. Thank you for your attention to these matters and I look forward to your reply. I have identified below the contact information for opposing counsel for convenience.

With regards, I am

Sincerely,


J. Cameron Halford

JCH:tml

cc: Blake Hewitt (e-mail): Blake@bluesteinattorneys.com

cc: Mark Tinsley (e-mail) Mark@goodingandgooding.com

cc: South Carolina Court Administration (U.S. Mail)

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

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

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Circuit Court Judge

Case no. 2019-000736

William Hunter Youmans, APPELLANT

vs.

Mark B. Tinsley and Diane E. Tinsley, RESPONDENTS

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CERTIFICATE AND PROOF OF SERVICE
MEMORANDUM IN SUPPORT OF
EXTENSION OF DEADLINE

Appellant counsel here certifies that on May 21, 2019 that a copy of the Notice of Motion and Motion for Enlargement of Time was served upon the below listed counsel of record by electronic filing and U.S. Mail, postage prepaid and addressed as follows:

Blake Hewitt, Esq.
Bluestein Thompson Sullivan, LLC
Post Office Box 7965
1614 Taylor Street,
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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

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

Respectfully submitted,

HALFORD NIEMIEC & FREEMAN, LLP

/s/ J. Cameron Halford

J. Cameron Halford
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803-547-6638 fax
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Attorney for Appellant

LAW OFFICES

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

May 21, 2019

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South Carolina Court of Appeals
V. Claire Allen, Deputy Clerk
Attn: Amelia Smith
Post Office Box 11629
Columbia, South Carolina 29211

Re: Appeal No. 2019-000736 William Hunter Youmans v. Mark B. Tinsley

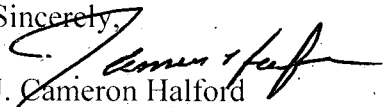
Dear Mrs. Allen :

Pursuant to the court's letter of May 17, 2019 I am attaching the original and six copies of the Motion to Enlarge time with the required filing fee and our certificate of service. I have attached our correspondence ordering the transcript and the court reporter acknowledgement as Exhibit-1 to the motion. Should there be any questions or concerns, please notify me.

Please return a filed copy in the envelope we have provided. Thank you.

With kind regards, I remain

Sincerely,


J. Cameron Halford

JCH:tml

cc: Blake Hewitt (email & U.S. Mail)

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

^ 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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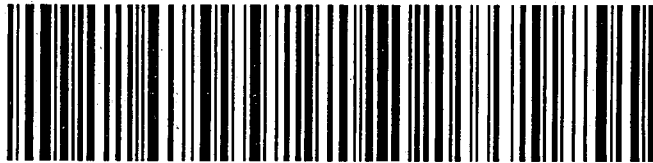
HALFORD, NIEMIEC, AND FREEMAN LLP
Attorneys at Law - J. Cameron Halford
238 ROCKMONT DRIVE
FORT MILL SC 29708

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SHIP TO: South Carolina Court of Appeals
V. Claire Allen / Amelia Smith
PO Box 11629
Columbia SC 29211-1629

USPS TRACKING #



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