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

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JAN 18 2022

SC Court of Appeals

APPEAL FROM ALLENDALE COUNTY
Court of Common Pleas

Hon. R. Lawton McIntosh
Circuit Court Judge

Appeals Case No. 2019-000736

William Hunter Youmans, APPELLANT

vs.

Mark B. Tinsley and Diane E. Tinsley, RESPONDENTS

APPELLANT MOTION FOR RE-HEARING
AND REINSTATEMENT

Appellant hereby motions the court for reconsideration and reinstatement of the above case, pursuant to Rule 242(C) of South Carolina Appellate Court Rules. Petitioner seeks reconsideration of the December 15, 2021 Order on the grounds that the statute §27-5-130(c) was in fact argued before the Circuit Judge (R. p. 362) as applicable, and Appellant respectfully asserts the Court of Appeals decision is in conflict with Supreme Court case *Stroman v. South Carolina Power Co.*, 168 S.C. 538,541, 167 S.E. 844, 845 (1933).

Respectfully submitted,

J. CAMERON HALFORD, LLC
/s/ J. Cameron Halford

J. Cameron Halford
4609 Charlotte Highway, Suite 3
Lake Wylie, South Carolina 29710
Attorney for Appellant

January 14, 2022

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PROOF OF SERVICE
APPELLATE PETITION FOR REHEARING
AND RECONSIDERATION

Appellant counsel here certifies that on January 14, 2022 that a copy of the Notice of Motion and Motion for re-instatement and reconsideration was with memorandum in support of same served upon the below listed counsel of record by electronic delivery and U.S. Mail, postage prepaid and addressed as follows:

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

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

Respectfully submitted,

J. CAMERON HALFORD, LLC

/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

January 14, 2022

LAW OFFICES
J. CAMERON HALFORD, LLC

4609 CHARLOTTE HIGHWAY SUITE 3
LAKE WYLIE, SOUTH CAROLINA 29710

TELEPHONE: 803-831-2738
FACSIMILE: 803-547-6638

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J. Cameron Halford
E-mail replies: cam@hoblaw.com

January 14, 2022

Hon. Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street,
Columbia, South Carolina 29201

Re: Appellate Case No. 2019-000736
Appellant Motion for Reconsideration


Dear Clerks Offices:

Please find enclosed for filing the original and six copies of the motion for reconsideration being filed by appellant in the above captioned case along with our proof of service, filing fee and return envelope.

Please return a clocked copy of the petition once filed. Thank you for your assistance.

With regards, I am

Sincerely,


J. Cameron Halford

JCH;drl
Enclosure/attachments
cc: Mark Brandon Tinsley, Esq. / Woodrow Gooding, Esq.
w/enclosures

^ CERTIFIED MEDIATOR IN S.C. AND N.C. COURTS
† OF COUNSEL, INDEPENDENTLY OWNED AND OPERATED LAW OFFICE

J. CAMERON HALFORD, LLC
4609 Charlotte Highway, Suite 3
Lake Wylie, South Carolina 29710



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