

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas
THE HONORABLE JOCELYN NEWMAN
Circuit Court Judge
Fifth Judicial Circuit

Appellate Case No. 2019-002076
CASE NO: 2018-CP-400-5641

RONALD I. PAUL.....Appellant,

V.

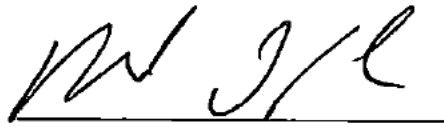
SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION; PAUL D. DE HOLCZER, individually and as a partner of the law Firm of Moses, Koon & Brackett, PC; MICHAEL H. QUINN, individually and as senior lawyer of Quinn Law Firm, LLC; J. CHARLES ORMOND, JR., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plante & Garner; OSCAR K. RUCKER, in his individual capacity as, Director Rights of Way South Carolina Department of Transportation; MACIE M. GRESHAM, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; NATALIE J. MOORE, in her individual capacity as assistant chief counsel South Carolina Department of Transportation..... Respondents.

**AMENDED
PETITION FOR REHEARING**

The Appellant Ronald I. Paul petitions the South Carolina Court of Appeals for a rehearing of the Court's recent decision in Paul v. SCDOT, Op. No. 2022-UP-051 (S.C. Ct. App. filed February 9, 2022).

The grounds for the Appellant Ronald I Paul petition for rehearing are addressed in detail in the supporting memorandum filed herewith and incorporated herein.

The Appellant Ronald I. Paul's petition for rehearing is based on the Court's decision in Paul vs SCDOT, Op. No. 2022-UP-051 (S.C. Ct. App. filed February 9, 2022); the supporting memorandum filed herewith; the briefs and Record on Appeal; Rule 221(a), SCACR; Rule 224, SCACR; and other rules of court.

A handwritten signature in black ink, appearing to read 'R I Paul', is written over a horizontal line.

Ronald I. Paul
Post Office Box 4353
Columbia, S.C. 29240
Appellant, *Pro Se* litigant
(803) 414-2305

February 22, 2022

Columbia, South Carolina

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CASE NO: 2018-CP-400-5641**

RONALD I. PAUL.....Appellant,

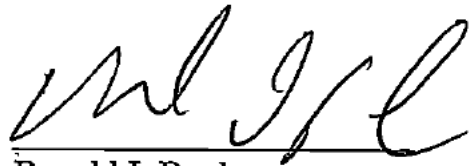
V.

SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION; PAUL D. DE HOLCZER, individually and as a partner of the law Firm of Moses, Koon & Brackett, PC; MICHAEL H. QUINN, individually and as senior lawyer of Quinn Law Firm, LLC; J. CHARLES ORMOND, JR., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plante & Garner; OSCAR K. RUCKER, in his individual capacity as, Director Rights of Way South Carolina Department of Transportation; MACIE M. GRESHAM, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; NATALIE J. MOORE, in her individual capacity as assistant chief counsel South Carolina Department of Transportation..... Respondents.

CERTIFICATE OF SERVICE

I, Ronald I. Paul hereby certify that I have served a copy of the Amended Petition for Rehearing and Memorandum in Support of Petition for Rehearing on all Respondents South Carolina Department of Transportation; Paul D. de Holczer individually, and as a partner of the law Firm of Moses, Koon & Brackett, P.C; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm, LLC; J. Charles Ormond, Jr., individually

and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner; Oscar K. Rucker, in his individual capacity as, Director Rights of Way South Carolina Department of Transportation; Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; Natalie J. Moore, in her individual capacity as assistant chief counsel South Carolina Department of Transportation by depositing a copy of it in the United State Mail, postage prepaid, on this date, February 22, 2022, addressed to the attorney of record or *Pro Se* Litigants and others as listed below.



Ronald I. Paul
Post Office Box 4353
Columbia, South Carolina 29240
(803) 414-2305
Appellant, *Pro Se* Litigant

February 22, 2022
Columbia, South Carolina

RESPONDENTS COUNSEL OF RECORD

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Columbia, South Carolina 29260
Attorney for Defendants South Carolina Department of Transportation,
Oscar K. Rucker, Macie M. Gresham, Natalie J. Moore and Paul D. de Holczer.

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Ronald Isaac Paul
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SC Court of Appeals

The Honorable Jenny Abbot Kitchings
Clerk of Court,
South Carolina Court of Appeals
1220 Senate Street,
Columbia, S.C. 29201