

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

FEB 22 2022

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.



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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**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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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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**Law Firm, LLC**

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**Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner**

Ronald Isaac Pugh  
PO Box 4353  
Columbia, SC 29210

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FEB 22 2022  
SC Court of Appeals

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