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| STATE OF SOUTH CAROLINA  COUNTY OF {county\_name\_allCaps}  {plaintiff\_name},  {plaintiff\_number},  vs.  {defendant\_name},  {defendant\_number}.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | )  )  )  )  )  )  )  )  )  )  )  )  ) | {court\_name\_allCaps}  CASE NO. {case\_number}  **MOTION TO RECONSIDER** |

YOU WILL PLEASE TAKE NOTICE that the plaintiff, by and through {plaintiff\_sex} undersigned attorney, will move at a date and time to be set by the Court for the Court to reconsider its ruling and alter or amend the ruling.

On {date\_of\_hearing}, the Court heard and granted the defendant’s {motion\_reconsidering}. The Court formalized its ruling in an Order entered on {date\_order\_formalized}. The plaintiff respectfully submits that the Court should have denied the defendant’s motion for multiple reasons, including but not limited to:

**Case specific argument(s)**

The plaintiff wishes to preserve for appeal every issue related to this action, including the issues discussed at the hearing; all issues contained in all pleadings, motions, responses, memoranda, and all other documents related to this action; and any other issues. The plaintiff wishes to preserve for appeal any issue that was discussed at the hearing and all other issues. The plaintiff respectfully submits that the motion to dismiss should have been denied because if the plaintiff can recover under any theory, a motion to dismiss should not be sustained. If the allegations {related\_to\_the\_defendant} are assumed to be true, {then\_the\_defendant\_caused} the plaintiff damages, and the plaintiff can recover against them. The plaintiff wishes to preserve for appeal issues related to the complete dismissal as well as issues related to areas of the law they seek to extend or change.

The plaintiff seeks to preserve all issues for appeal pursuant to Rule 59, including, but not limited to, subsection (e); Rule 60; and all other applicable rules. For the foregoing reasons, the plaintiff respectfully requests that the Court reconsider and reverse its ruling.

Respectfully Submitted,

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*{s\_attorney\_filing}*

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{footer\_attorney\_3\_email}

Attorneys for Plaintiff

{footer\_city\_state}

{filing\_date}