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Feb 14 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

The Honorable Bentley D. Price

C.A. No.: 2022-CP-23-04704

Marcelo Torricos, as Trustee of the John W.
Beeson Irrevocable Trust II FBO James H.
Beeson dated August 5, 2021 Plaintiff/Respondent,

v.

Greenville County Planning Commission Defendant/Appellant.

CONSENT MOTION FOR STAY PENDING SETTLEMENT

The parties are pleased to report that they have reached an agreement to resolve this matter in full. Appellant, with the Respondent’s consent, moves that the appeal and any deadlines be stayed until the settlement can be finalized at which time a motion for agreed dismissal will be submitted pursuant to Rule 260(b), SCACR. In the event the parties are unable to finalize the settlement, Appellant will promptly notify the Court so this appeal may proceed.

Respectfully submitted,

HAYNSWORTH SINKLER BOYD, P.A.

s/ Sarah P. Spruill

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Attorneys for Appellant

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Beeson dated August 5, 2021 Plaintiff/Respondent,

v.

Greenville County Planning Commission Defendant/Appellant.

PROOF OF SERVICE

I certify that I have served *Consent Motion for Stay Pending Settlement* on counsel of record on February 14, 2024, by electronic mail only to the following:

Bruce W. Bannister, Esq.
Luke Anthony Burke, Esq.
Marcelo Torricos III, Esq.
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VIA EMAIL AND U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

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SC Court of Appeals

Re: *Marcelo Torricos, as Trustee of the John W. Beeson Irrevocable Trust II FBO James H. Beeson dated August 5, 2021 v. The Greenville County Planning Commission*
Appellate Case No. 2023-000699

Dear Ms. Kitchings:

This firm represents the Appellant in the above-captioned matter. Enclosed for filing, please find a *Consent Motion for Stay Pending Settlement* together with our Proof of Service for the same. Also enclosed is our firm's check to cover the cost of the filing fee (w/ mailed copy).

Please note service on counsel of record by copy of this letter. In the meantime, we ask that the current filing deadlines be stayed pending resolution of this request. If you have any questions, please give me a call. Thank you for your assistance in this matter.

Sincerely yours,

HAYNSWORTH SINKLER BOYD, P.A.



Sarah P. Spruill

SPS/sac

Enclosure

cc: Bruce W. Bannister, Esq. (bbannister@bannisterwyatt.com)
Luke Anthony Burke, Esq. (lburke@bannisterwyatt.com)
Marcelo Torricos III, Esq. (mtorricos@bannisterwyatt.com)