



**Ballard
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PERSISTENT. UNWAVERING.

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Thursday, August 01, 2013

Via U.S. Mail

Honorable Daniel E. Shearouse
Clerk of Court
Supreme Court of South Carolina
Post Office Box 11330
Columbia South Carolina 29211

Re: *1634 Main LP v Hammer v Hammer*
Case No: 2010-CP-40-02889

Dear Ms. Kitchings:

Please find enclosed an original and seven (7) copies of Ms. Hammer's Motion for Certification, Consolidation and to Expedite. Also enclosed is our motion filing fee in the amount of \$25.00 and our Certificate of Service. Please return a file stamped copy of the motion to us in the enclosed self-addressed, stamped envelope for our files.

Thank you in advance for your time and attention to this matter. If you should have any questions, please do not hesitate to contact us. With warm personal regards, I am,

Sincerely yours,

Mara T. Ballard, CFE, CMA
Forensic Accountant
mara@desaballard.com

c: ✓ Honorable Jenny Abbott Kitchings
Arthur K. Aiken, Esquire
Susan B. Lipscomb, Esquire
Howard Hammer, Esquire
Shirley Hammer (via email only)

2013-001634
RECEIVED

AUG 05 2013

SC Court of Appeals

COPY

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Richland County
George C. James Jr., Circuit Court Judge
James F. Barber Jr., Supervising Circuit Court Judge
Case No. 2010-CP-40-2889

Pending Before the South Carolina Court of Appeals¹

1634 Main LP,

Appellant

Vs.

Shirley Hammer,

Respondent

Vs.

Howard Hammer,

Appellant.

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AUG 05 2013

SC Court of Appeals

MOTION FOR CERTIFICATION, CONSOLIDATION
AND TO EXPEDITE

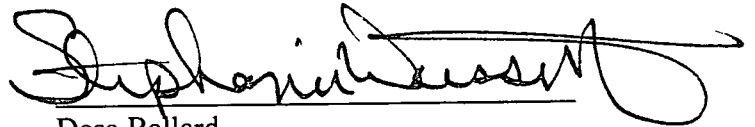
Respondent Shirley Hammer (hereafter Ms. Hammer) moves this Court, pursuant to 204(b) and 214, SCACR, for an order certifying this appeal to the Supreme Court for all purposes, consolidating it with a second filed appeal in Howard Hammer v. Shirley Hammer, Case No 2009-CP-40-05911, and expediting the appeals. In support of her motions, Ms. Hammer incorporates by reference the arguments, exhibits and prayer set forth in the **Motion for Certification, Consolidation and to Expedite** contemporaneously filed this date in Hammer v. Hammer, Case No. 2009-CP-40-05911.

¹ Ms. Hammer's counsel was informed yesterday that Appellate Tracking Numbers have not yet been assigned. Counsel was also informed that a Motion to Remand one of the appeals has been filed this date, which counsel believes is a sign of Mr. Hammer's efforts to delay and complicate these appeals.

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Wherefore, Mrs. Hammer moves for an order:

- A. Certifying to this Court all appeals in Hammer v. Hammer, Case No. 2009-CP-40-05911 and in 1634 Main LP v. Shirley Hammer, Case No. 2010-CP-40-2889, both already filed and any future filings;
- B. Consolidating all appeals in both matters as necessary to expeditiously conclude the appeals;
- C. Expediting all appeals in both matters; and
- D. For such and other relief as this Court deems appropriate to protect the interests of this Court and the judicial system.



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ATTORNEYS FOR SHIRLEY HAMMER

August 1, 2013

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Richland County
George C. James, Jr., Circuit Court Judge
James F. Barber Jr., Supervising Circuit Court Judge
Case No. 2010-CP-40-02889

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1634 Main LP,

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Certificate of Service

I, Mara T. Ballard, an employee of Desa Ballard, PA d/b/a Ballard Watson Weissenstein, do hereby certify that on August 1, 2013, that I served a copy of the Motion for Certification, Consolidation and to Expedite on all known counsel of record, by placing a copy thereof in the United States Mail, with sufficient first class postage affixed, addressed as follows:

COPY

Arthur K. Aiken Esquire
Aiken & Hightower
2231 Devine St.
Ste. 201
Columbia South Carolina 29205

Susan Batten Lipscomb
Lipscomb Law Firm, PA
1634 Main Street, Suite 200
Columbia South Carolina 29201

Howard Hammer
1609 Catawba Street
Columbia South Carolina 29205


Mara T. Ballard, CMA, CFE, FA

August 1, 2013