

**RECEIVED**

**Apr 02 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

Appeal from Horry County Court of Common Pleas  
B. Alex Hyman, Circuit Court Judge

---

Case No. 2023-CP-26-03818  
Appellate Case No. 2024-000275

---

Justin Cramer

Respondent,

v.

Ronald Scott Pyle and Pyle Wealth Management, Inc.

Appellants.

---

**JOINT MOTION TO STAY APPEAL DEADLINES**

---

Plaintiff, Justin Cramer, and Defendants, Ronald Scott Pyle and Pyle Wealth Management, Inc. (collectively the “Parties”), are contemplating settlement of this case, and accordingly respectfully request that the Court stay all proceedings and appeal deadlines in this case for 60 days while the parties work in good faith to produce a Settlement Agreement and Release. In support of this Motion, the Parties state as follows:

1. The Parties are engaging in settlement discussions with the possibility of a second attempt at mediation and anticipate that those discussions and the scheduling of mediation, if necessary, would take approximately 45-60 days.

2. The Court has authority to stay this case under its inherent authority to “control the disposition of cases on its docket with economy of time and effort for itself, for counsel, and for litigants.” S.C. State Conf. of NAACP v. McMaster, 572 F. Supp. 3d 215, 200 (D.S.C. 2021) (quoting Landis v. N. Am. Co., 299 U.S. 248, 254, 57 S. Ct. 163, 81 L. Ed. 153 (1936)).

3. Here, the requested stay will promote judicial efficiency and avoid unnecessary litigation, while the parties work in good faith to effect a settlement.

WHEREFORE, the Parties request that the Court stay all proceedings and appeal deadlines for 60 days. A Proposed Order is submitted along with this Motion.

Respectfully submitted this 1<sup>st</sup> day of April, 2024.

By: /s/ Reese R. Boyd, III  
Reese R. Boyd, III  
DAVIS & BOYD, LLC  
1110 London Street, Suite 201  
Myrtle Beach, South Carolina 29577  
843.839.9800 (Phone)  
843.839.9801 (Facsimile)  
[reese@davisboydlaw.com](mailto:reese@davisboydlaw.com)

Lucas J. Asper  
S. Michael Nail  
OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.  
300 North Main Street, Suite 500  
Greenville, South Carolina 29601  
864.271.1300 (Phone)  
864.235.4754 (Facsimile)  
[lucas.asper@ogletree.com](mailto:lucas.asper@ogletree.com)  
[michael.nail@ogletree.com](mailto:michael.nail@ogletree.com)  
*Attorneys for Defendants*

/s/ Michael H. Montgomery  
Michael H. Montgomery  
Montgomery Willard, LLC  
1002 Calhoun Street  
PO Box 11886  
Columbia, SC 29211  
(803) 753-6484 (Phone)  
[mhm@montgomerywillard.com](mailto:mhm@montgomerywillard.com)

*Attorney for Plaintiff*