

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM DORCHESTER COUNTY
Master in Equity

The Honorable James E. Chellis

Case No. 2021-CP-18-01535
Appellate Case No. 2024-000430

Sinclair Brown, Jr. and Joetta A. Brown,.....Respondents,

v.

George B. Corrie, II, Shawna Corrie, Anthony Wayne All, Sandra Rae All, Paul W. Jones, Madelyn W. Jones, Keith A. Muray, Stephanie L.R. Murray, Dollar Bank Federal Savings Bank, The Bank of South Carolina, John Doe and Mary Roe, fictitious names representing unknown persons who may claim any right, title or interest or lien upon the subject real estate, as well as anyone who may be incompetents, in the military, or under any legal disability, and Richard Roe and Sarah Doe, fictitious names representing all unknown heirs and devisees, Defendants,

Of which George B. Corrie, II and Shawna Corrie are the.....Appellants.

RESPONDENTS' MOTION FOR A
TEMPORARY RESTRAINING ORDER

Pursuant to Rules 240, 241, 205 SCACR the Respondents, Sinclair Brown, Jr. and Joetta A. Brown, (the "Respondents"), by and through their undersigned counsel, hereby move for the Court for an order granting the Respondents an enforcement of the stay of the matters on appeal against the Appellants, George Corrie, II and Shawna Corrie, (the "Appellants").

On February 6, 2024, The Honorable James Chellis ruled that the Respondents own property submerged under water at the pond at the rear of their property along with property abutting that pond. Subsequent to that order, the Appellants, have continued trespassing, creating a nuisance depriving Respondents of their quiet enjoyment, and are now planting trees on the Respondents' property. The trespass is in violation of the Order of Judge Chellis and all matters in this case should be stayed while the appeal is pending.

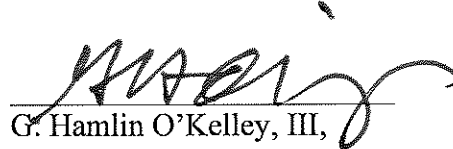
An Affidavit of the Respondent, Sinclair Brown, Jr., is attached hereto.

Counsel requests that all timelines be held in abeyance while the Court considers this request.

Respectfully submitted.

Mount Pleasant, South Carolina
July 8, 2024

BUIST BYARS & TAYLOR, LLC



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STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

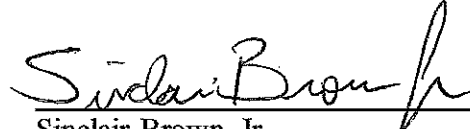
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AFFIDAVIT
OF
SINCLAIR BROWN, JR.


1. I am over the age of twenty-one years, and I make this Affidavit on my own personal knowledge and not upon any information or belief.
2. I am a Respondent in this matter.
3. My wife, Joetta A. Brown, and I are the owners of the subject property located at 1668 Sandridge Road, Dorchester, South Carolina, (the "Property").
4. On February 6, 2024, the Honorable James Chellis ruled that my wife and own property submerged under water at the pond at the rear of our property along with property abutting that pond.
5. Subsequent to that Order, the Appellants George B. Corrie, II, and Shawna Corie (the "Appellants") have been trespassing and planting trees on my Property as of last week.
6. Photos I took of the planted trees are attached hereto as Exhibit A.
7. That trespass is in violation of the Order of Judge Chellis and all matters in this case should be stayed while the appeal is pending.
8. The Appellants continue to trespass, create a nuisance and deprive my wife and I of the quiet enjoyment of our Property, and

FURTHER THE AFFIANT SAYETH NOT.

July 8, 2024


Sinclair Brown, Jr.

Sworn to before me this 8
day of July, 2024


Notary Public for South Carolina
My Commission Expires: _____

AMANDA TAYLOR DOWD
Notary Public, State of South Carolina
My Commission Expires 1/4/2028









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Jul 08 2024

SC Court of Appeals

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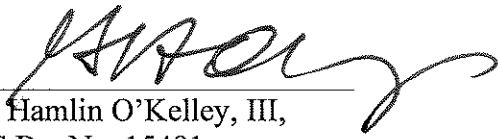
PROOF OF SERVICE

I certify that I have served the Respondents' Motion for Temporary Restraining Order by depositing a copy of same Via Email ssmith@scnlaw.com and zclosser@scnlaw.com, and Via US Mail, addressed to Steven L. Smith and Zachary James Closser, PO Box 40578, Charleston, SC 29423-0578.

SIGNATURE BLOCK ON FOLLOWING PAGE

Mount Pleasant, South Carolina
July 8, 2024

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Attorney At Law
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July 8, 2024

VIA EMAIL: ctappfilings@sccourts.org
AND US MAIL
The Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29211

RECEIVED
Jul 08 2024
SC Court of Appeals

*Re: Sinclair Brown, Jr. v George B. Corrie et al.,
Appellate Case No. 2024-0043-
Client File No.: 1219.0051*

Dear Ms. Kitchings:

Enclosed please find an original and one (1) copy of the Respondents' Motion for a Temporary Restraining Order and Proof of Service in the above-referenced matter.

By copy of this letter, I am serving same upon all counsel. Should you have any questions, feel free to contact our office at your convenience.

With warm regards, I remain

Yours very truly,



G. Hamlin O'Kelley, III

GH0III/atd

Cc: (w/ Encl.)
Steven L. Smith, Esq.