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**Oct 14 2024**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM GREENVILLE COUNTY  
Court of Common Pleas

G. D. Morgan, Judge

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Appellate Case No. 2024-000727

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Letchworth Properties, LLC .....  
Appellant,

v.

City of Greer and City of Greer  
Board of Zoning Appeals .....  
Respondents.

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**APPELLANT’S MOTION TO STAY PROCEEDINGS**

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J. Marshall Lawson (SC Bar No. 17020)  
The Lawson Law Firm, LLC  
4329 Kilbourne Road  
Columbia, South Carolina 29206  
Phone: (803) 730-3510

**Attorney for Appellant**

Letchworth Properties, LLC

Appellant respectfully moves this Court to Stay all further proceeding in this matter for a period of 30 days following the Court's resolution of Respondents' Motion to Strike. In their Motion, filed October 11, 2024, Respondents move the Court to strike certain matters from Appellant's Designation of Matter to be Included in the Record on Appeal.<sup>1</sup> Appellant intends to file a Return thereto within the time prescribed by Rule 240(e), SCACR.

Pursuant to Rules 210(a), 210(b) and 211, SCACR, Appellant's service and filing of the Record on Appeal and Final Brief are pending. The requested Stay would preserve the resources of the Court and Appellant by allowing reasonable, additional time for Appellant's service and filing of the Record on Appeal and Final Brief following the Court's ruling on Respondents' Motion.

Respectfully submitted,

*/s/ J. Marshall Lawson*

J. Marshall Lawson (SC Bar No. 17020)  
The Lawson Law Firm, LLC  
4329 Kilbourne Road  
Columbia, South Carolina 29206  
Phone: (803) 730-3510

*Attorney for Appellant*

October 14, 2024  
Columbia, South Carolina

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<sup>1</sup> The Court rejected Respondents' original Motion to Strike, filed October 7, 2024, for failure to comply with Rule 240, SCACR.

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Court of Common Pleas

G. D. Morgan, Jr., Circuit Court Judge

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Appellate Case No. 2024-000727

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Letchworth Properties, LLC..... Appellant,

v.

City of Greer, South Carolina, and Greer Board of Zoning Appeals..... Respondents.

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**PROOF OF SERVICE**

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*Attorney for Appellant  
Letchworth Properties, LLC*

I, J. Marshall Lawson, do hereby certify that I served Appellant's MOTION TO STAY PROCEEDINGS on the following counsel of record for Respondents via electronic mail (see attached email) to counsel's AIS E-mail address on October 14, 2024.

Daniel R. Hughes, Esq.  
Duggan & Hughes, LLC  
457-B Pennsylvania Avenue  
Greer, SC 29650  
(864) 334-2500  
[dhughes@dugganhughes.com](mailto:dhughes@dugganhughes.com)

Respectfully submitted,

By: /s/ J. Marshall Lawson  
J. Marshall Lawson (SC Bar No. 17020)  
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*Attorney for Appellant*

*Letchworth Properties, LLC*

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**SC Court of Appeals**

***The Lawson Law Firm, LLC***

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(803) 730-3510  
marshall@lawsonlawsc.com**

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October 14, 2024

**SENT VIA EMAIL: ctappfilings@sccourts.org**

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

RE: **MOTION TO STAY PROCEEDINGS:** Letchworth Properties, LLC v. City of Greer and City Greer Board of Zoning Appeals, Appellate Case No. 2024-000727

Dear Ms. Kitchings:

Attached for filing is Appellant's Motion to Stay Proceedings pending resolution of Respondents' Motion to Strike and Proof of Service in the matter referenced above. A check for the filing fee in the amount of \$50.00 will be deposited in today's mail.

Please let me know if you have questions or comments.

Sincerely,

*/s/ J. Marshall Lawson*

The Lawson Law Firm, LLC

Attachment(s) as stated

cc: Daniel Hughes, Esquire