

From: [Hines, Russell](#)
To: [Court Of Appeals Filings](#)
Cc: [Brown, Stephen L.](#); [Davis, Jay](#); [Riddle, Matthew](#); [Justman, Aimee](#); [Bell, Pollyana \(Polly\)](#); [Peterson, Susan](#); [Bohannon, Kiara](#); [Eadie, Christine](#); shawnpinkston@me.com
Subject: Haynes v. Fundamental (2025-000286) -- Appellants' Amended Motion to Enforce the Automatic Stay and Jurisdictional Limitation Pending Appeal
Date: Friday, March 7, 2025 2:59:00 PM
Attachments: [image001.png](#)
[Haynes v. Fundamental \(2025-000286\) -- Am. Motion to Enforce Automatic Stay & Jurisdictional Limitation.pdf](#)
[Ex. 1 -- Subject Subpoena \(amended motion\).pdf](#)
[Ex. 2 -- Complaint.pdf](#)
[Ex. 3 -- Motion to Compel Arbitration-Stay.pdf](#)
[Ex. 4 -- Decl. of Matthew O. Riddle \(w Exhibits\).pdf](#)
[Ex. 5 -- Memo in Supp. of Motion to Compel Arbitration-Stay \(wo Exhibits\).pdf](#)
[Ex. 6 -- Arbitration Agreement.pdf](#)
[Ex. 7 -- Primary Appealed Order.pdf](#)
[Ex. 8 -- Motion to Reconsider.pdf](#)
[Ex. 9 -- Secondary Appealed Order.pdf](#)
[Ex. 10 -- Notice of Appeal & Proof of Service.pdf](#)
[Ex. 11 -- Initial Letter from the Court of Appeals.pdf](#)
[Haynes v. Fundamental \(2025-000286\) -- POS for Am. Motion to Enforce Automatic Stay & Jurisdictional Limitation.pdf](#)

*** **EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

With apologies for the multiple filings, attached for filing in the above-referenced matter please find **Appellants' Amended Motion to Enforce the Automatic Stay and Jurisdictional Limitation Pending Appeal**, the **Exhibits** attached thereto, and **Proof of Service**.

Please Note: Since this filing is simply an amendment of the original motion filed earlier today, it is my understanding that an additional motion filing fee is NOT required, i.e., that only one motion filing fee is required, not two. As stated in my email submitting the original motion earlier today, that motion filing fee will be mailed to the Court.

Thank you.

Russell G. Hines
CLEMENT RIVERS, LLP
www.ycrlaw.com
25 Calhoun Street, Suite 400
Charleston, South Carolina 29401
P.O. Box 993 (29402)
Phone: (843) 720-5488
Fax: (843) 579-1327
Email: rhines@ycrlaw.com



CLEMENT RIVERS, LLP
25 Calhoun Street • Suite 400 • Charleston, SC 29401
ycrlaw.com

Clement Rivers, LLP

https://protect.checkpoint.com/v2/r01/___http://www.ycrlaw.com___YzJ1OnNjanVkaWNpYWw6YzpvOmVkMDkyMmUxOGZmNmY4YjhhNjhlNjkxMjY5ZmFiZDk2Ojc6OGViMjo4YzRhOGQ0Y2ViYjg1MDMwOGJhYzE3N2YyMjg4NzRhM2QyZWVkMmZkZWE4YjM4MDk1MTFiMWQ2OWE3ZmVjZTlmOnQ6VDpO

Charleston: (843) 577-4000

Attachments larger than 40MB may be rejected by the firm's server. If you are sending an attachment of this size or larger, please contact the intended recipient to inform him/her of your transmission.

"ATTORNEY-CLIENT PRIVILEGED; DO NOT FORWARD WITHOUT PERMISSION."

The information contained in this transmission is privileged and confidential. It is intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone or by email to email@ycrlaw.com or by replying to this message and destroy all copies of this message and all attachments.