

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

R. Markley Dennis, Jr., Circuit Court Judge

\_\_\_\_\_  
Appellate Case No.: 2022-000622  
Circuit Case No.: 2022-CP-10-03684  
\_\_\_\_\_

**RECEIVED**

AUG 01 2025

SC Court of Appeals

RUSSELL CRAWFORD,

Respondent,

v.

RAYMOND BABICH,

Appellant.

\_\_\_\_\_  
**RESPONDENT'S OPPOSITION TO APPELLANT'S "EMERGENCY MOTION"**  
\_\_\_\_\_

**PLEASE TAKE NOTICE** that the Respondent, Raymond Babich, by his undersigned attorney of record, hereby submits the following Memorandum to the "Emergency Motion" by Appellant Russell T. Crawford ("Appellant") dated July 14, 2025 which requests a stay of eviction but which otherwise would constitutes a Motion for Rehearing under Appellate Rule 221.

**I. Appellant's Motion Does Not Comport with Rule 221 and Should be Summarily Denied.**

The Appellant cites that he is entitled to a stay in execution of the eviction proceeding which initiated the proceedings in Magistrate Court before the instant appeal.

However, Appellant is already proceeding with the benefit of an Order from the Circuit Judge R. Markley Dennis that he continue to pay monthly rent while this appeal is pending. That has been the law of the case since this appeal was filed. No Remittitur has issued from this Court; therefore, no need exists to stay anything proceeding in Magistrate Court at this time.

Next, Rule 221 states that a Petition for Rehearing “shall state with particularity the points supposed to have been overlooked or misapprehended by the Court.” With respect to Appellant being a pro se litigant, the argument points made by the Appellant merely repeat point headings made in the Appellant’s Final Brief and make conclusory arguments unsupported by citations to the Record on Appeal. With regard to the argument that Appellant was deprived due process by the circuit hearing not being recorded, this is untrue. In his Final Brief, Appellant claimed that the recording could not afterwards be located for transcription. Appellant Brief at 8. Appellant made no claim before this Court on appeal that his “due process rights” were violated by the missing the Circuit Court hearing recording, and such argument has no merit regardless. Similarly, the new argument that the Circuit Judge refused to allow his attorney’s argument is a new claim that has no citation to any evidence in the Record on Appeal. Both of these “arguments” are not preserved on appeal and violate the requirements of Appellate Rule

221.

Dated: July 25, 2025

Respectfully submitted,



William B. Jung, Esq. (68788)  
1156 Bowman Road, Ste. 200  
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Attorney for the Respondent

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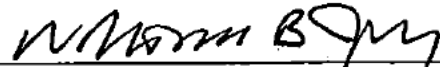
SC Court of Appeals

**PROOF OF SERVICE**

I, William B. Jung, Esq., certify under penalty of perjury that on July 25, 2025, I served a copy of the Respondent's Opposition to "Emergency Motion" / Motion for Rehearing by the Appellant by emailing and mailing a true and complete copy thereof the Appellant:

Raymond T. Crawford  
4683 W. Montague Ave., Lot 3  
North Charleston, S.C. 29418  
[russellcrawfordsc@gmx.com](mailto:russellcrawfordsc@gmx.com).

Dated: July 25, 2025



William B. Jung, Esq. (#0068788)  
Attorney for the Respondent

ADMITTED  
SOUTH CAROLINA  
NEW YORK

**WILLIAM B. JUNG, ESQ.**

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July 25, 2025

The Hon. Jenny Abbott Kitchings  
Clerk of Court  
S.C. Court of Appeals  
1220 Senate Street  
P.O. Box 11629  
Columbia, S.C. 29211

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Re: Russell Crawford v. Raymond Babich  
Appellate Case No.: 2022-000622

Dear Madame Clerk:

I represent Respondent Raymond Babich on the above appeal.

I am writing to file Respondent's Opposition to a Rehearing Motion dated July 14, 2025 filed by the Appellant. There are six copies and one original. A Proof of Service is attached to the unbound original.

Kindly please file the same. Thank you for your courtesy.

Sincerely yours,



William B. Jung

WBJ:wbj  
Encl.  
cc. Russell Crawford



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1156 BOWMAN ROAD, STE. 200  
MOUNT PLEASANT, SC 29664

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