

THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Benjamin H. Culbertson, Circuit Court Judge
Case No. 2024-CP-26-00018

RECEIVED

Sep 16 2025

SC Court of Appeals

WILLIS JOWAN MITCHELL,

Plaintiff–Appellant,

v.

PINE COVE MHP, LLC and

CRAIG WARREN STURGILL,

Defendants–Respondents.

MOTION

**APPELLANT’S MOTION TO STAY ENFORCEMENT PENDING APPEAL
AND MOTION TO EXPEDITE APPEAL**

Date: September 16, 2025

Respectfully submitted.

/s/ Willis Jowan Mitchell

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APPELLANT'S MOTION TO EXPEDITE APPEAL

COMES NOW, Plaintiff–Appellant, **Willis Jowan Mitchell**, pro se, and respectfully moves this Court to expedite consideration of his appeal pursuant to Rule 240, SCACR, and the Court's inherent equitable powers.

GROUNDS FOR MOTION

1. This appeal involves immediate **housing rights and family welfare**, including the potential eviction of Appellant and his minor child.
2. The trial court's judgment, if not promptly reviewed, will result in irreparable harm by forcing Appellant from his residence before this Court can address whether the judgment is void for lack of notice and unsupported by evidence.
3. Appellant has diligently prepared and filed his appellate brief and related documents without delay.
4. The issues presented are **narrow and well-defined**, focusing on constitutional notice, excusable neglect under Rule 60(b), SCRCR, and lack of evidence supporting damages.

RELIEF REQUESTED

Appellant respectfully requests that this Court:

- Expedite the scheduling and consideration of this appeal; and
- Prioritize oral argument and decision in order to prevent irreparable harm.

September 16, 2025

Respectfully submitted,

/s/ **Willis Jowan Mitchell**

Willis Jowan Mitchell

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