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Oct 07 2025

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM OCONEE COUNTY
Court of Common Pleas

Steven E. Kirven, Master in Equity

Appellate Case No. 2025-000223

Ex Parte: Christopher A. Pierce,Appellant

Foxwood Hills Property Owners Association,.....Respondent,

v.

Michael D. Jewell, Lori Marsengill, and South Carolina Department
of Motor Vehicles, Defendants,

Of which Michael D. Jewell is an Appellant

RESPONDENT'S MOTION
FOR CONTINUANCE OF THE APPEAL

John S. Kay
Hutchens Law Firm LLP
240 Stoneridge Drive, Suite 400
Columbia, S.C. 29210
Phone: (803) 726-2700
john.kay@hutchenslawfirm.com
Attorney for Respondent

Michael D. Jewell
428 Odessa Avenue
Westminster, S.C. 29693

Christopher A. Pierce
605 White Owl Lane
Seneca, S.C. 29678

MOTION TO CONTINUE APPEAL

This is a homeowners' association lien foreclosure in which the Appellants and the Respondent are working on a settlement that would resolve the within Appeal, and the underlying state court case designated as Case No. 2023-CP-37-00620. In order to work through the details of a settlement and to establish those terms in writing, the Appellants and the Respondent have agreed to request a sixty (60) continuance of the Appeal and any upcoming deadline regarding the submission of the Record on Appeal and final briefs.

If the Court grants the requests, the parties to the Appeal believe they can reach a final settlement without incurring additional fees and costs to the parties. This request is not being interposed for delay other than to allow the parties to work on a settlement. The Appellant will be responsible for the filing fee for this motion.

October 7, 2025



/s/ John S. Kay
John S. Kay, S.C. Bar #7914
HUTCHENS LAW FIRM
P.O. Box 8237 (29202)
Columbia, S.C. 29202
803-726-2700 (ext. 2705)
Email: John.kay@hutchenslawfirm.com
*Attorney for Respondent Foxwood Hills Property
Owners Association*

From: Yodda Pierce <ntsl532@yahoo.com>
Sent: Friday, October 3, 2025 9:19 AM
To: John S. Kay
Cc: mikejewell2804@gmail.com
Subject: Jewell settlement

Good morning Mr Kay,

I understand we have the two unresolved issues left and that is the \$1,500 credit I have asked for, and the desire of foxwood hills POA to have me sign off to something stating that I'm going to pay a special assessment on the property. I think I have an answer to resolve those two issues.

Essentially I've been a mediator in this matter and trying to get the parties together to for resolution. Now that I've done that I can step aside and let the parties settle this matter because the matter is essentially Mr Jewel paying \$8,500 in return for dismissal of a foreclosure action. I'm not involved in any of that that's a legal action matter so I'll step aside and step out of it all together and not be involved in contributing any money or anything or asking for any credits from FHPOA and then you can then go ahead and sign a contract with him instead of me and this matter is completed and everybody walks away happy. Because I won't be involved in any of the contract signing at all so you won't have to include me and demand that I pay a special assessment on the property which would directly conflict with my ongoing lawsuit that I have.

If this proposal satisfies your requirements let me know and Mr Jewel know and the parties Mr Jewell and foxy those POA can move forward with a final settlement on this matter.

Also please send me a copy of motion asking for 60 day extension for time with the appeals court else Mr Jewell and myself would have to file a similar motion with the court if you're unable to do that today.

Chris Pierce

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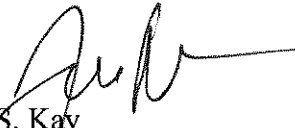
Ex Parte: Christopher A. Pierce, Appellant,
Foxwood Hills Property Owners Association, Respondent,
v.

Michael D. Jewell, Lori R. Marsengill, and South Carolina Department
of Transportation, Defendants,
of which Michael D. Jewell is an Appellant.

PROOF OF SERVICE

I hereby certify that I have served the Respondent's Motion to Continue Appeal on Michael D. Jewell and Christopher A. Pierce by depositing a copy of it in the United States mail, postage prepaid, on October 7, 2025, addressed to Michael D. Jewell at 428 Odessa Avenue, Westminster, South Carolina 29693 and on Christopher A. Pierce at 605 White Owl

Lane, Seneca, South Carolina 29678



/s/John S. Kay

John S. Kay (S.C. Bar No. 7914)

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Attorney for Respondent Foxwood Hills Property Owners
Association.

October 7, 2025

Columbia, South Carolina