

In the South Carolina Court of Appeals

I Miranda Ann Mitchum Appellant

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Oct 21 2025

SC Court of Appeals

v
David Hayes and Brooks Hayes
Respondent

Case # 2024-CP-0803108 Lower court
Berkeley County
Common Pleas

Case # 2025-001820
Appellate case

In the Court of appeals of South Carolina
Emergency motion for Stay pending appeal
To the honorable justices of the court of
appeals

Miranda Mitchum respectfully moves this
court for an emergency stay of lower
court's order dated Sept 29, 2025 by
Judge T.J. Rode pending the final
resolution of the appeal in this matter.

This court has jurisdiction to grant a
stay of proceedings during the pendency
of an appeal pursuant to South Carolina
Appellate Court Rule 241 and Rule 62
of the South Carolina Rules of Civil
Procedure.

1. The judgment entered against
me the Appellant is what I am
appealing. The final order I am
appealing from Sept 29, 2025

...
Miranda Mitchum

2. I am requesting a stay of execution because if not stayed I would suffer irreparable injury. I am a single mother with my mother living with me who had a stroke last year.

3. I requested a stay with the lower court on Sept 30, 2025 and they denied the motion.

Grounds for emergency stay

1. Irreparable harm if not stayed because I am the take care of my mother and children who live with me.

2. There is a strong likelihood I will prevail on the merits of my appeal and the lower court decision will be reversed.

3. The harm if not stayed would outweigh the potential harm to the opposing party if the stay is not granted.

4. The public interest would be served by granting the stay.

5. My mother and children depend solely on my care to take care of them.

6. For the foregoing reasons I Miranda Mitchum respectfully request that this honorable court grant an emergency stay of the lower courts order pending the resolution of the appeal. Thank you God bless.

7. I am mailing a 50 dollar money order to the honorable court today.

Miranda Mitchum hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Oct 21, 2025

Miranda Mitchum
430 Levee Drive
Moncks Corner, S.C.
29461

Certification of Service
I hereby certify that on Oct 21, 2025 a true and correct copy of the foregoing Emergency Motion for Stay pending Appeal was served upon the following via certified mail

John West Attorney for Respondents
David Hayes and ~~John~~ ^{Michelle} Brodes Ashley Hayes
207 Carolina Ave
Moncks Corner, S.C.
29461

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Miranda Mitchum 