

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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APPEAL FROM Lexington COUNTY
Court of Common Pleas

OCT 31 2025

SC Court of Appeals

J. Kershaw Song Circuit Court Judge

Case No. 2023-CP-32 02327

Judith Ann Kelly
Trustee of JUDITH ANN KELLY
FAMILY TRUST

Appellant/Respondent,

v.

Penny Mac Loan Services LLC

Appellant/Respondent.

MOTION

Motion to STAY FORECLOSURE PENDING
APPEAL

Filed pursuant to Rule 211, South Carolina
Appellate Court Rules and Rule 62(b), South Carolina
Rules of Civil Procedure

Date: 10-31-2025

s/ Judith Kelly ^{ETM}

Name: Judith Kelly
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Lexington, SC 29073

Phone: (678) 790-8425

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Appellant

Other Counsel of Record:

Name: Sean M. Foerster Esq
Address: 1221 Main Street 14th Floor
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Respondent/Attorney for Respondent

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as Trustee of JUDITH ANN KELLY
FAMILY TRUST

Appellant/Respondent,

v.

Penny MacLean LLC

Appellant/Respondent.

PROOF OF SERVICE

I certify that I have served the Motion Stay on Sean M. Foerster by depositing
(Document) (Name)

a copy of it in the United States Mail, postage prepaid, on 10-31-2025, addressed to,
(Date)

Sean M. Foerster Esq 1221 Main Street 14th Floor
Columbia, SC 29201

Date: 10-31-2025

Judith Kelly
Address: 408 Cannonvale Ct
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