

In the honorable court of appeals of South Carolina
Appellate Case # 2025-001820
Circuit Court Case # 2024-cp 0803108

Miranda Mitchum Appellant
630 levee Drive
Moncks Corner, SC.
29461

RECEIVED
Nov 17 2025
SC Court of Appeals

v

David Hayes and Brooks A Hayes Respondents
Attorney for Respondents
John West
207 Carolina Ave
Moncks Corner, SC
29461

Emergency motion to stay lower
court proceedings pending appellate
review of lack of personal jurisdiction
and bond waiver

To the honorable court of appeals of
South Carolina I Miranda Mitchum
hereby moves this court pursuant to
Rule 241 SCACR for an emergency writ
of supersedeas and an order staying
all proceedings in Berkeley County Common
Pleas related to the undertaking or bond
hearing until this court issues a decision on
Appellants pending motion for Bond Waiver
and review of the personal jurisdiction
issue. The appeals court has a pending
motion for bond waiver and review
of lack of personal jurisdiction. In this
motion allowing the bond hearing to proceed
would prejudice my case and undermine
the appellate courts ability to rule

effectively on my pending motion to waive bond and lack of personal jurisdiction. Under the fourteenth amendment of the constitution. The fourteenth amendment Due Process clause requires that I be given proper notice before a court can exercise power over me. Proper service ensures that the defendant has a fair opportunity to respond and defend their interests. The likelihood of success on the bond waiver and personal jurisdiction appeal shows success on the merits.

memorandum in support of motion

Appellate court has jurisdiction over the issues raised in my pending motion waiver of bond and lack of personal jurisdiction. Allowing the lower court to proceed would cause irreparable harm. SCACR 2416(b) allows petitioning the appellate court for review of lower courts orders related to stays or the courts inherent power to control its jurisdiction. Under my motions of lack of personal jurisdiction and the fourteenth amendment of Due Process proceeding with a bond hearing is fundamentally unjust.

wherefore Appellant respectfully requests this honorable court to issue an immediate order staying the lower court proceedings specifically the bond hearing until such time as the court has ruled on Appellants pending motions.

Prayer for Relief Appellant requests that this emergency motion for stay of proceedings Pending Appellate Review be granted.

Also issue an immediate stay on all further proceedings. Grant any other relief the court deems just and proper. Thank you God Bless.

November 17, 2025

Miranda Mitchum

Miranda Mitchum

630 Levee Drive

Marcks Corner, SC.

29461

843-609-7320

mirandamitchum0392@gmail.com

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Carolina Appellate Court case #2025-01820
Lower court case #2024-cp 0803108

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VS

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Certificate of Service

I hereby certify that on November 17, 2025 I
served a true and correct copy of the following

1. Emergency motion to stay lower
court proceedings pending appellate
review or lack of personal jurisdiction
and bond waiver

to the following individuals through
United States certified mail to counsel

John West
207 Carolina Ave
Moncks Corner, SC.
29461

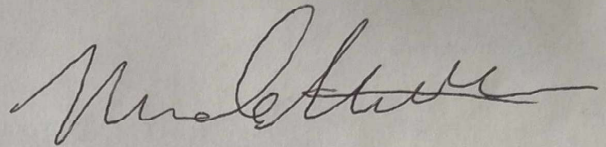
I declare under penalty of perjury that
the foregoing is true and correct.

November 17, 2025

Miranda Mitchum
Miranda Mitchum
630 Levee Drive #320
Moncks Corner, SC 29461
843 609 4320

Statement of money order

I Miranda Mitchem made a money order for 50 dollars for motion to stay lower court proceedings pending review of lack of personal jurisdiction and bond waiver to South Carolina Court of appeals on Nov. 17, 2025



630 Levee Drive
Moncks Corner, SC
29461

843-609-4320