

THE SOUTH CAROLINA COURT OF APPEALS

RECEIVED
Apr 02 2026
SC Court of Appeals

Reliance First Capital, LLC,

Appellate Case No. 2026-000306

Respondent,

v.

Nikia Renee Noisette and
Arbor Oaks Homeowners Association,
Defendants, of which
Nikia Renee Noisette is the appellant

MOTION TO STAY BRIEFING DEADLINE

PENDING RESOLUTION OF RECORD AND EXTENSION MOTION

Appellant, Nikia Renee Noisette, respectfully moves this Court to stay the deadline for filing the Appellant's Brief, and states as follows:

1. Procedural Background

1. Appellant timely filed a Notice of Appeal in this matter.
2. The Appellant's Brief is currently due on April 3, 2026.
3. Appellant has filed a Second Motion for Extension of Time to Serve Record on Appeal and File Appellant's Brief, which remains pending before this Court.

2. Record on Appeal Not Yet Finalized

4. On April 1, 2026, Appellant filed in the lower court a:

Motion to Settle, Correct, and Supplement the Record

5. That motion seeks to address material issues affecting the accuracy and completeness of the record, including transcript inaccuracies and omitted filings bearing on service of process, jurisdiction, and standing.

3. Necessity of Stay

6. The Appellant's Brief must be prepared from a complete and accurate Record on Appeal.
7. Because the record is presently incomplete and disputed, proceeding with briefing at this time would impair meaningful appellate review and prejudice Appellant.

4. Good Faith Protective Request

8. This Motion is submitted as a protective measure pending the Court's ruling on Appellant's Second Motion for Extension of Time and the resolution of the record in the lower court.
9. Appellant seeks only to ensure compliance with the Court's deadlines while the record is being properly settled.

5. Relief Requested

WHEREFORE, Appellant respectfully requests that this Court:

1. Stay the deadline for filing the Appellant's Brief pending resolution of the Motion to Settle, Correct, and Supplement the Record in the lower court and the Court's ruling on the pending Second Motion for Extension of Time;
2. Thereafter, set the deadline for the Appellant's Brief to:

**Fourteen (14) days after the record on appeal is settled and certified,
or such other time as this Court deems just and proper;**

3. Grant such other and further relief as the Court deems appropriate.

Respectfully submitted,

Nikia Renee Noisette

Appellant,

402 Arbor Oaks Drive

Summerville, SC [29485]

Date: April 2, 2026

CERTIFICATE OF SERVICE

I certify that on this 2nd day of April, 2026, I served a true and correct copy of the foregoing:

Protective Motion to Stay Briefing Deadline Pending Resolution of Record and Extension Motion

upon counsel for Respondent by the method indicated below:

U.S. Mail

Hand Delivery

Electronic Filing

E-mail

addressed as follows:

James M. Page, Esq.

Bell Carrington Price & Gregg, LLC

339 Heyward Street, 2nd Floor

Columbia, South Carolina 29201

Email: mpage@bellcarrington.com


Nikia Renee Noisette

Appellant