

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

71530

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

RECEIVED

MAR 11 2014

---

Case No.: 2012-CP-18-2826

SC Court of Appeals

---

Monique Frazier, individually, and on behalf of all similarly situated  
Plaintiffs,.....Appellant

vs.

Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management,  
Inc., aka Mitchell Management, Inc., Allen Harken, Kathi Barfield Ducharme, John Doe  
Leasing Agents and John Doe Premises  
Managers.....Respondents.

---

**Motion to Stay Time Limits**

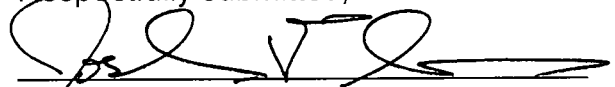
---

Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803)-254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

Pursuant to Rule 240, SCACR, Respondents Somerset South Carolina, LLC (“Somerset”) and Multifamily Management, Inc. (“Multifamily”), hereby move for an Order staying the time limits imposed by the South Carolina Rules of Appellate Procedure related to service of Initial Briefs, specifically the deadline for Respondents to serve their Initial Brief, see Rule 208, SCACR, and Designation of Matter to be Included in the Record on Appeal, see Rule 209, SCACR. The grounds for this Motion are that Respondents believe the instant Appeal should be dismissed and have contemporaneously filed a Motion to Dismiss the Appeal on several grounds. Respondents respectfully submit that the most efficient manner of proceeding in this matter would be to stay the remaining briefing deadlines – other than those related to Respondents’ Motion to Dismiss – until such time as the Motion to Dismiss is resolved.

Respectfully submitted,



Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803) 254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

March 10, 2014

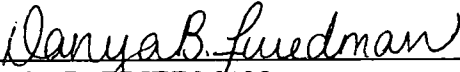
**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March, 2014 a copy of the above and foregoing Motion to Stay Time Limits has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Albert A. Lacour, III, Esq.  
Clawson and Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

Roy Wiley, Esq.  
Anastopoulo Law Firm  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Paul Eliot Sperry, Esq.  
Carlock Copeland and Stair  
40 Calhoun St., Ste. 400  
Charleston, SC 29401

  
\_\_\_\_\_  
DANYA B. FRIEDMAN  
LEGAL SECRETARY

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

---

Case No.: 2012-CP-18-2826

---

Monique Frazier, individually, and on behalf of all similarly situated  
Plaintiffs, .....Appellant

vs.

Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management,  
Inc., aka Mitchell Management, Inc., Allen Harken, Kathi Barfield Ducharme, John Doe  
Leasing Agents and John Doe Premises  
Managers .....Respondents.

---

**Motion to Stay Time Limits**

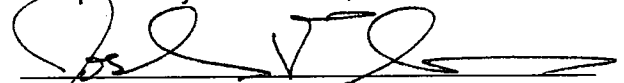
---

Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803)-254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

Pursuant to Rule 240, SCACR, Respondents Somerset South Carolina, LLC (“Somerset”) and Multifamily Management, Inc. (“Multifamily”), hereby move for an Order staying the time limits imposed by the South Carolina Rules of Appellate Procedure related to service of Initial Briefs, specifically the deadline for Respondents to serve their Initial Brief, see Rule 208, SCACR, and Designation of Matter to be Included in the Record on Appeal, see Rule 209, SCACR. The grounds for this Motion are that Respondents believe the instant Appeal should be dismissed and have contemporaneously filed a Motion to Dismiss the Appeal on several grounds. Respondents respectfully submit that the most efficient manner of proceeding in this matter would be to stay the remaining briefing deadlines – other than those related to Respondents’ Motion to Dismiss – until such time as the Motion to Dismiss is resolved.

Respectfully submitted,



Steven W. Ouzts

Jonathan G. Roquemore

Joshua D. Shaw

Turner Padgett Graham & Laney P.A.

Post Office Box 1473

Columbia, SC 29202

(803) 254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

March 10, 2014

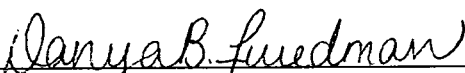
**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March, 2014 a copy of the above and foregoing Motion to Stay Time Limits has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Albert A. Lacour, III, Esq.  
Clawson and Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

Roy Wiley, Esq.  
Anastopoulo Law Firm  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Paul Eliot Sperry, Esq.  
Carlock Copeland and Stair  
40 Calhoun St., Ste. 400  
Charleston, SC 29401

  
\_\_\_\_\_  
DANYA B. FRIEDMAN  
LEGAL SECRETARY

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

---

Case No.: 2012-CP-18-2826

---

Monique Frazier, individually, and on behalf of all similarly situated  
Plaintiffs,.....Appellant

vs.

Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management,  
Inc., aka Mitchell Management, Inc., Allen Harken, Kathi Barfield Ducharme, John Doe  
Leasing Agents and John Doe Premises  
Managers.....Respondents.

---

**Motion to Stay Time Limits**

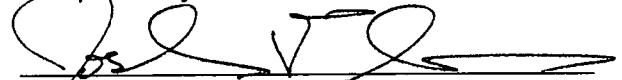
---

Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803)-254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

Pursuant to Rule 240, SCACR, Respondents Somerset South Carolina, LLC (“Somerset”) and Multifamily Management, Inc. (“Multifamily”), hereby move for an Order staying the time limits imposed by the South Carolina Rules of Appellate Procedure related to service of Initial Briefs, specifically the deadline for Respondents to serve their Initial Brief, see Rule 208, SCACR, and Designation of Matter to be Included in the Record on Appeal, see Rule 209, SCACR. The grounds for this Motion are that Respondents believe the instant Appeal should be dismissed and have contemporaneously filed a Motion to Dismiss the Appeal on several grounds. Respondents respectfully submit that the most efficient manner of proceeding in this matter would be to stay the remaining briefing deadlines – other than those related to Respondents’ Motion to Dismiss – until such time as the Motion to Dismiss is resolved.

Respectfully submitted,



Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803) 254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

March 10, 2014


**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March, 2014 a copy of the above and foregoing Motion to Stay Time Limits has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Albert A. Lacour, III, Esq.  
Clawson and Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

Roy Wiley, Esq.  
Anastopoulo Law Firm  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Paul Eliot Sperry, Esq.  
Carlock Copeland and Stair  
40 Calhoun St., Ste. 400  
Charleston, SC 29401

  
\_\_\_\_\_  
DANYA B. FRIEDMAN  
LEGAL SECRETARY

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

---

Case No.: 2012-CP-18-2826

---

Monique Frazier, individually, and on behalf of all similarly situated  
Plaintiffs,.....Appellant

vs.

Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management,  
Inc., aka Mitchell Management, Inc., Allen Harken, Kathi Barfield Ducharme, John Doe  
Leasing Agents and John Doe Premises  
Managers.....Respondents.

---

**Motion to Stay Time Limits**

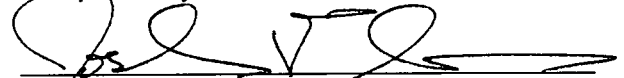
---

Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803)-254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

Pursuant to Rule 240, SCACR, Respondents Somerset South Carolina, LLC (“Somerset”) and Multifamily Management, Inc. (“Multifamily”), hereby move for an Order staying the time limits imposed by the South Carolina Rules of Appellate Procedure related to service of Initial Briefs, specifically the deadline for Respondents to serve their Initial Brief, see Rule 208, SCACR, and Designation of Matter to be Included in the Record on Appeal, see Rule 209, SCACR. The grounds for this Motion are that Respondents believe the instant Appeal should be dismissed and have contemporaneously filed a Motion to Dismiss the Appeal on several grounds. Respondents respectfully submit that the most efficient manner of proceeding in this matter would be to stay the remaining briefing deadlines – other than those related to Respondents’ Motion to Dismiss – until such time as the Motion to Dismiss is resolved.

Respectfully submitted,



Steven W. Ouzts

Jonathan G. Roquemore

Joshua D. Shaw

Turner Padgett Graham & Laney P.A.

Post Office Box 1473

Columbia, SC 29202

(803) 254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

March 10, 2014

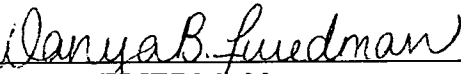
**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March, 2014 a copy of the above and foregoing Motion to Stay Time Limits has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Albert A. Lacour, III, Esq.  
Clawson and Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

Roy Wiley, Esq.  
Anastopoulo Law Firm  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Paul Eliot Sperry, Esq.  
Carlock Copeland and Stair  
40 Calhoun St., Ste. 400  
Charleston, SC 29401

  
\_\_\_\_\_  
DANYA B. FRIEDMAN  
LEGAL SECRETARY

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

---

Case No.: 2012-CP-18-2826

---

Monique Frazier, individually, and on behalf of all similarly situated  
Plaintiffs,.....Appellant

vs.

Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management,  
Inc., aka Mitchell Management, Inc., Allen Harken, Kathi Barfield Ducharme, John Doe  
Leasing Agents and John Doe Premises  
Managers.....Respondents.

---

**Motion to Stay Time Limits**

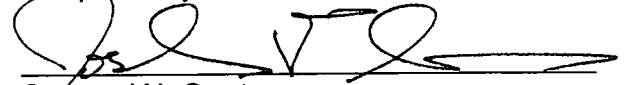
---

Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803)-254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

Pursuant to Rule 240, SCACR, Respondents Somerset South Carolina, LLC ("Somerset") and Multifamily Management, Inc. ("Multifamily"), hereby move for an Order staying the time limits imposed by the South Carolina Rules of Appellate Procedure related to service of Initial Briefs, specifically the deadline for Respondents to serve their Initial Brief, see Rule 208, SCACR, and Designation of Matter to be Included in the Record on Appeal, see Rule 209, SCACR. The grounds for this Motion are that Respondents believe the instant Appeal should be dismissed and have contemporaneously filed a Motion to Dismiss the Appeal on several grounds. Respondents respectfully submit that the most efficient manner of proceeding in this matter would be to stay the remaining briefing deadlines – other than those related to Respondents' Motion to Dismiss – until such time as the Motion to Dismiss is resolved.

Respectfully submitted,



Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803) 254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

March 10, 2014

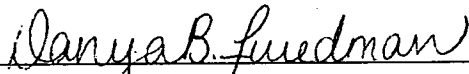
**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March, 2014 a copy of the above and foregoing Motion to Stay Time Limits has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Albert A. Lacour, III, Esq.  
Clawson and Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

Roy Wiley, Esq.  
Anastopoulo Law Firm  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Paul Eliot Sperry, Esq.  
Carlock Copeland and Stair  
40 Calhoun St., Ste. 400  
Charleston, SC 29401

  
\_\_\_\_\_  
DANYA B. FRIEDMAN  
LEGAL SECRETARY

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

---

Case No.: 2012-CP-18-2826

---

Monique Frazier, individually, and on behalf of all similarly situated  
Plaintiffs,.....Appellant

vs.

Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management,  
Inc., aka Mitchell Management, Inc., Allen Harken, Kathi Barfield Ducharme, John Doe  
Leasing Agents and John Doe Premises  
Managers.....Respondents.

---

**Motion to Stay Time Limits**

---

Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803)-254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

Pursuant to Rule 240, SCACR, Respondents Somerset South Carolina, LLC ("Somerset") and Multifamily Management, Inc. ("Multifamily"), hereby move for an Order staying the time limits imposed by the South Carolina Rules of Appellate Procedure related to service of Initial Briefs, specifically the deadline for Respondents to serve their Initial Brief, see Rule 208, SCACR, and Designation of Matter to be Included in the Record on Appeal, see Rule 209, SCACR. The grounds for this Motion are that Respondents believe the instant Appeal should be dismissed and have contemporaneously filed a Motion to Dismiss the Appeal on several grounds. Respondents respectfully submit that the most efficient manner of proceeding in this matter would be to stay the remaining briefing deadlines – other than those related to Respondents' Motion to Dismiss – until such time as the Motion to Dismiss is resolved.

Respectfully submitted,



Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803) 254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

March 10, 2014

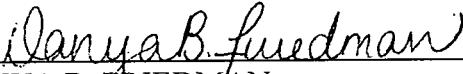
**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March, 2014 a copy of the above and foregoing Motion to Stay Time Limits has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Albert A. Lacour, III, Esq.  
Clawson and Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

Roy Wiley, Esq.  
Anastopoulo Law Firm  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Paul Eliot Sperry, Esq.  
Carlock Copeland and Stair  
40 Calhoun St., Ste. 400  
Charleston, SC 29401

  
\_\_\_\_\_  
DANYA B. FRIEDMAN  
LEGAL SECRETARY

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

---

Case No.: 2012-CP-18-2826

---

Monique Frazier, individually, and on behalf of all similarly situated  
Plaintiffs,.....Appellant

vs.

Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management,  
Inc., aka Mitchell Management, Inc., Allen Harken, Kathi Barfield Ducharme, John Doe  
Leasing Agents and John Doe Premises  
Managers.....Respondents.

---

**Motion to Stay Time Limits**

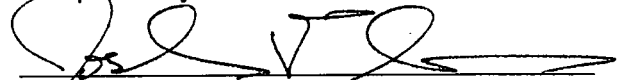
---

Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803)-254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

Pursuant to Rule 240, SCACR, Respondents Somerset South Carolina, LLC ("Somerset") and Multifamily Management, Inc. ("Multifamily"), hereby move for an Order staying the time limits imposed by the South Carolina Rules of Appellate Procedure related to service of Initial Briefs, specifically the deadline for Respondents to serve their Initial Brief, see Rule 208, SCACR, and Designation of Matter to be Included in the Record on Appeal, see Rule 209, SCACR. The grounds for this Motion are that Respondents believe the instant Appeal should be dismissed and have contemporaneously filed a Motion to Dismiss the Appeal on several grounds. Respondents respectfully submit that the most efficient manner of proceeding in this matter would be to stay the remaining briefing deadlines – other than those related to Respondents' Motion to Dismiss – until such time as the Motion to Dismiss is resolved.

Respectfully submitted,



Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803) 254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

March 10, 2014

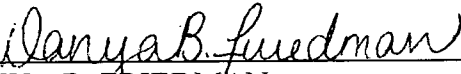
**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March, 2014 a copy of the above and foregoing Motion to Stay Time Limits has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Albert A. Lacour, III, Esq.  
Clawson and Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

Roy Wiley, Esq.  
Anastopoulo Law Firm  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Paul Eliot Sperry, Esq.  
Carlöck Copeland and Stair  
40 Calhoun St., Ste. 400  
Charleston, SC 29401

  
\_\_\_\_\_  
DANYA B. FRIEDMAN  
LEGAL SECRETARY

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM DORCHESTER COUNTY  
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

---

Case No.: 2012-CP-18-2826

---

Monique Frazier, individually, and on behalf of all similarly situated  
Plaintiffs, .....Appellant

vs.

Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management,  
Inc., aka Mitchell Management, Inc., Allen Harken, Kathi Barfield Ducharme, John Doe  
Leasing Agents and John Doe Premises  
Managers .....Respondents.

---

**Motion to Stay Time Limits**

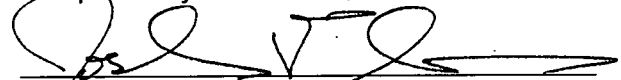
---

Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803)-254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

Pursuant to Rule 240, SCACR, Respondents Somerset South Carolina, LLC ("Somerset") and Multifamily Management, Inc. ("Multifamily"), hereby move for an Order staying the time limits imposed by the South Carolina Rules of Appellate Procedure related to service of Initial Briefs, specifically the deadline for Respondents to serve their Initial Brief, see Rule 208, SCACR, and Designation of Matter to be Included in the Record on Appeal, see Rule 209, SCACR. The grounds for this Motion are that Respondents believe the instant Appeal should be dismissed and have contemporaneously filed a Motion to Dismiss the Appeal on several grounds. Respondents respectfully submit that the most efficient manner of proceeding in this matter would be to stay the remaining briefing deadlines – other than those related to Respondents' Motion to Dismiss – until such time as the Motion to Dismiss is resolved.

Respectfully submitted,



Steven W. Ouzts  
Jonathan G. Roquemore  
Joshua D. Shaw  
Turner Padgett Graham & Laney P.A.  
Post Office Box 1473  
Columbia, SC 29202  
(803) 254-2200

Attorney for Respondents  
Somerset South Carolina, LLC and  
Multifamily Management, Inc.

March 10, 2014

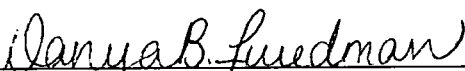
**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of March, 2014 a copy of the above and foregoing Motion to Stay Time Limits has been mailed to all counsel of record, postage prepaid and properly addressed as follows:

Albert A. Lacour, III, Esq.  
Clawson and Staubes, LLC  
126 Seven Farms Dr., Ste. 200  
Charleston, SC 29492

Roy Wiley, Esq.  
Anastopoulo Law Firm  
2557 Ashley Phosphate Rd.  
North Charleston, SC 29418

Paul Eliot Sperry, Esq.  
Carlock Copeland and Stair  
40 Calhoun St., Ste. 400  
Charleston, SC 29401

  
\_\_\_\_\_  
DANYA B. FRIEDMAN  
LEGAL SECRETARY

**RECEIVED**  
MAR 11 2014  
**SC Court of Appeals**

# TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

CHARLESTON  
COLUMBIA  
FLORENCE  
GREENVILLE  
MYRTLE BEACH

Joshua D. Shaw

JShaw@TurnerPadget.com  
Writer's Direct Dial: (803) 227-4310  
Direct Fax: (803) 400-1455

March 10, 2013

The Honorable Jenny Abbott Kitchings  
Clerk of Court – Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

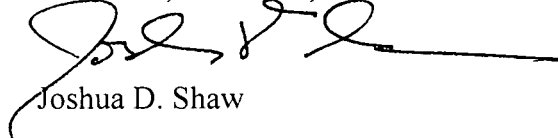
Re: Monique Frazier, et al. v. Somerset South Carolina, LLC d/b/a Somerset Apartments, Multifamily Management, Inc., a/k/a Mitchell Management, Inc., et al.  
Civil Action No. 2012-CP-18-2826  
Our file: 987.484

Dear Ms. Kitchings:

Please find enclosed the original (unbound) and seven (7) copies of Respondents' Motion to Dismiss Appeal and Respondents' Motion to Stay Time Limits, as well as the required \$50.00 filing fee for both motions. Please file the originals in your office and return a clocked copy of each to us in the self-addressed stamped envelope provided. Thank you for your assistance in this matter, and please do not hesitate to contact me should you have any questions.

Sincerely,

TURNER, PADGET, GRAHAM & LANEY, P.A



Joshua D. Shaw

JDS:dbf  
Enclosures

cc: Albert A. Lacour, III, Esquire  
Eric Marc Poulin, Esquire  
Roy Wiley, Esquire  
Paul Eliot Sperry, Esquire

**RECEIVED**  
MAR 11 2014  
**SC Court of Appeals**

BUSINESS • LITIGATION • SOLUTIONS

Bank of America Plaza • 17th Floor • 1901 Main Street (29201) • PO Box 1473 • Columbia, SC 29202  
Phone (803) 254-2200 • Fax (803) 799-3957 • turnerpadget.com

PRIORITY MAIL  
Carrier-DasPrice

Hasler

03/10/2014

\$06.16<sup>9</sup>

US POSTAGE

ZIP 29201

011D11610872



# TURNER PADGET

TURNER PADGET GRAHAM & LANEY P.A.

BUSINESS • LITIGATION • SOLUTIONS

PO Box 1473 • Columbia, SC 29202

987.484

RECEIVED

MAR 11 2014

SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court – Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211