

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM AIKEN COUNTY
In the Court of Common Pleas

Doyet A. Early, III, Presiding Judge

Case No. 2013-000826

RECEIVED

MAR 03 2014

SC Court of Appeals

William R. Ferrara Appellant,

v.

Michael E. Hunt, Sheriff of Aiken County;
and Charles Cain in his individual capacity as Deputy Sheriff Defendants,

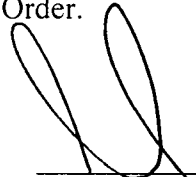
Of whom Michael E. Hunt is the Respondent.

MOTION FOR CONSOLIDATION

The undersigned, as counsel for the Appellant hereby moves for an Order consolidating the above-captioned Appeal with the Appeal captioned William R. Ferrara, Appellant v. Michael E. Hunt, Sheriff of Aiken County, and Charles Cain in his individual capacity as Deputy Sheriff, and the Aiken County Sheriff's Department, Defendants, Of whom Charles Cain in his individual capacity as Deputy Sheriff is the Respondent, Appellate Case No. 2013-001909. This matter is made on the grounds that both Appeals arise out of the same factual scenario and out of the same Court of Common Pleas Civil Action. The Trial Court issued two Orders arising out of the same motion hearing, therefore there are two separate Appeals pending before the Court.

This motion is further made on the grounds that one Record on Appeal will be sufficient for both matters and a consolidation Order from this Court will prevent Appellant from having to incur the cost and expense of preparing two voluminous Records on Appeal.

WHEREFORE, Appellant respectfully prays that this Court enter its Order consolidating the two appeals in this matter and further holding all deadlines in the above-captioned Appeal in abeyance pending issuance of the Court's Order.

A handwritten signature in black ink, appearing to be 'S. Jahue Moore', is written over a horizontal line.

S. Jahue Moore, Esquire
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ATTORNEYS FOR APPELLANT

March 3, 2014

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SC Court of Appeals

William R. Ferrara Appellant,

v.

Michael E. Hunt, Sheriff of Aiken County;
and Charles Cain in his individual capacity as Deputy Sheriff Defendants,

Of Whom Michael E. Hunt is the Respondent.

Case No. 2013-001909

William R. Ferrara Appellant,

v.

Michael E. Hunt, Sheriff of Aiken County; Aiken County Sheriff's Department,
Charles Cain in his individual capacity as Deputy Sheriff
and the Aiken County Sheriff's Department Defendants,

Of whom Charles Cain in his individual capacity as Deputy Sheriff is the Respondent.

PROOF OF SERVICE

I certify that I have served the Motions for Consolidation, by mail, upon all counsel of record on March 3, 2014.

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