

# WRIGHT, WORLEY, POPE, EKSTER & MOSS, PLLC

ATTORNEYS AT LAW  
628A SEA MOUNTAIN HIGHWAY  
NORTH MYRTLE BEACH, SOUTH CAROLINA 29582  
Telephone (843) 281-9901 - Fax (843) 281-9903

O. RICHARD WRIGHT, JR.\*  
DENNIS T. WORLEY\*  
HAROLD G. "Butch" POPE\*  
PAUL J. EKSTER\*\*  
KENNETH R. MOSS  
MICHAEL T. SMITH  
MARTHA HENLEY SLEDGE •  
MELANIE C. NICHOLSON ♦  
KELLY SANSONE-GALLEY ♦  
NAPOLEON B. BAREFOOT, JR. •  
ELIZABETH W. EMBREY\*\*\*  
BOYD T. WORLEY\*  
PRESTON B. HILTON\*  
RICHARD S. "RICK" PARROTTE\*

D.F. McGOUGAN, JR.  
(1921 - 1994)

**OTHER OFFICES**  
SURFSIDE BEACH, SC  
SUPPLY, NC  
TABOR CITY, NC  
WHITEVILLE, NC  
WILMINGTON, NC

\*licensed only in NC  
\*\*licensed in NC, DC & SC  
\*\*\* licensed in NC & SC  
• licensed in NC, Of Counsel

♦ Certified Family Court Mediator, Guardian *ad Litem*

June 5, 2014

**VIA CERTIFIED MAIL # 7007 0710 0003 9853 9382**

**RETURN RECEIPT REQUESTED**

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**  
JUN 09 2014  
SC Court of Appeals

RE: Protection for Attorney Kenneth R. Moss, SCB # 15520

Dear Ms. Kitchings:

Please find enclosed copies of Orders of Protection granting me protection from trials or hearings in the Horry and Georgetown County Courts from July 7, 2014 through July 11, 2014, for a family vacation. I am aware that the Court of Appeals does not grant protection, however, I respectfully request the Court's consideration of this matter.

I am counsel in the following appeals pending before this Court:

- (1) Elizabeth A. Crotty and James K. Orzech, *Appellants* v. Windjammer Village of Little River, South Carolina, Property Owners' Association, *Respondent*  
Horry County Court of Common Pleas, Civil Action No. 2009-CP-26-10523  
**Appellate Case No. 2012-213287**  
Our file no. SC-2156-009A
- (2) William H. Bailey, Jr., *Appellant* v. City of North Myrtle Beach, a South Carolina Municipal Corporation, *Respondent*  
Horry County Court of Common Pleas, Civil Action No. 2009-CP-26-10523  
**Appellate Case No. 2013-000195**  
Our file no. SC-3922.007

The Honorable Jenny Abbott Kitchings

July 5, 2014

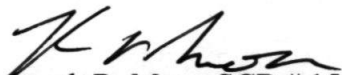
Page 2

- (3) ✓ Helicopter Solutions, Inc., d/b/a Helicopter Adventures, *Respondent*  
v. Richard Hinde and Horry County Zoning Administrator, *Defendants*,  
Of whom Richard Hinde is *Appellant*  
Horry County Court of Common Pleas, Civil Action No. 2012-CP-26-06987  
**Appellate Case No. 2013-000971**  
Our file no. SC-5530-001
- (4) William H. Bailey, Jr., *Appellant* v. Marilyn Hatley, *et al.*, *Respondents*  
Horry County Court of Common Pleas, Civil Action No. 2013-CP-26-08446  
**Appellate Case No. 2014-000756**  
Our file no. SC-3922-012A
- (5) Parkway Plaza POA, Inc., *et al.* v. Carroll Wayne Hill, and HMT Group, LLC  
HMT Group, LLC, *Appellants* v. Horry County, a South Carolina County, and  
Hartland Properties, LLC, *Respondents*  
Horry County Court of Common Pleas, Civil Action No. 2011-CP-26-06190  
**Appellate Case No. 2014-000905**  
Our file no. SC-2235-036A
- (6) State of South Carolina, *Respondent* v. Billy Leon Alford, *Appellant*  
Horry County Court of General Sessions, Case No. 2014-CP-26-01587  
**Appellate Case No. – not yet assigned**  
Our file no. SC-5538-002

I appreciate any consideration you may give to this request. By copy of this letter I have copied all counsel of record.

With best regards, I am

Sincerely yours,

  
Kenneth R. Moss, SCB # 15520

KRM/jml  
Enclosures as stated

The Honorable Jenny Abbott Kitchings

July 5, 2014

Page 3

cc: (1) Elizabeth A. Crotty, *pro se Appellant*  
James K. Orzech, *pro se Appellant*

(2) Derwood L. Aydlette, III, Esq.  
Christopher W. Johnson, Esq.  
*Attorneys for Respondent*

(3) David B. Miller, Esq.  
Benjamin A. Barody, Esq.  
*Attorneys for Respondent Helicopter Solutions, Inc.*

Emma Ruth Brittain, Esq.  
*Attorney for Defendant Horry County Zoning Administrator*

(4) Michael W. Battle, Esq.  
*Attorney for Respondent*

(5) Lynette Rogers Hedgepath, Esq.  
*Attorney for Respondents*

Lisa A. Thomas, Esq.  
*Attorney for Respondent Horry County, a South Carolina County*

Kevin M. Hughes, Esq.  
*Attorney for Respondent Hartland Properties, LLC*

(6) Jimmy A. Richardson, II, Esq.  
*Attorney for Respondent*

STATE OF SOUTH CAROLINA )  
 )  
COUNTIES OF HORRY )  
AND GEORGETOWN )  
 )  
IN RE: )  
Kenneth R. Moss )  
Attorney at Law )  
\_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
FIFTEENTH JUDICIAL CIRCUIT

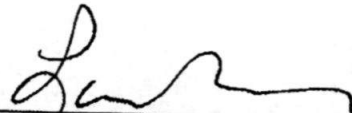
**ORDER OF PROTECTION**

It appearing unto this Honorable Court that Kenneth R. Moss, Attorney at Law, has requested an Order of Protection in the Court of Common Pleas for the following dates: Monday, July 7, 2014 through Friday, July 11, 2014.

It further appears that the protection that Mr. Moss is requesting should be granted for good cause shown.

IT IS HEREBY ORDERED that Attorney Kenneth R. Moss shall be granted protection from any trials or hearings in the Court of Common Pleas of the Fifteenth Judicial Circuit on the following dates: Monday, July 7, 2014 through Friday, July 11, 2014.

**IT IS SO ORDERED.**



\_\_\_\_\_  
Honorable Larry B. Hyman Jr.  
Chief Administrative Judge  
Court of Common Pleas  
Fifteenth Judicial Circuit

April 10, 2014  
Conway, South Carolina

**RECEIVED**  
JUN 09 2014  
SC Court of Appeals

STATE OF SOUTH CAROLINA )  
COUNTIES OF HORRY )  
AND GEORGETOWN )

IN THE COURT OF GENERAL SESSIONS  
FIFTEENTH JUDICIAL CIRCUIT

IN RE:

**KENNETH R. MOSS**  
Attorney at Law

**ORDER OF PROTECTION**

It appearing unto this Honorable Court that Kenneth R. Moss, Attorney at Law, has requested an Order of Protection for the following dates: July 7 – 11, 2014.

Further appears that the protection that Mr. Moss is requesting should be granted, for good cause shown, an Order protecting him from all appearances in all court proceedings on the following dates: July 7 – 11, 2014, in the Court of General Sessions of the Fifteenth Judicial Circuit.

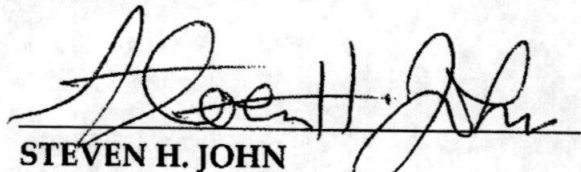
It is therefore

**ORDERED** that Kenneth R. Moss, Esquire be and is hereby granted protection from all court appearances in the Court of General Sessions of the Fifteenth Judicial Circuit from July 7 – 11, 2014.

**IT IS FURTHER ORDERED**, that the Attorney at law referenced herein shall provide notice of this Order of Protection to all counsel of record, and any witnesses he has subpoenaed in any cases that this attorney has pending before the Court.

**IT IS SO ORDERED.**

4/8/ 2014  
Conway, South Carolina



**STEVEN H. JOHN**  
Chief Administrative Judge  
Court of General Sessions  
Fifteenth Judicial Circuit