

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas

Marvin H. Dukes, Master in Equity

Appellate Case No. 2014-002290

RECEIVED
NOV 24 2014
SC Court of Appeals

Daufuskie Island Properties, LLC,
and its successor in interest, Ace
Basin Investments, LLC,

Appellant,

v.

Raymond Travaglione,

Respondent.

MOTION TO STAY APPEAL PENDING THE DISPOSITION OF THE
UNDERLYING ACTION

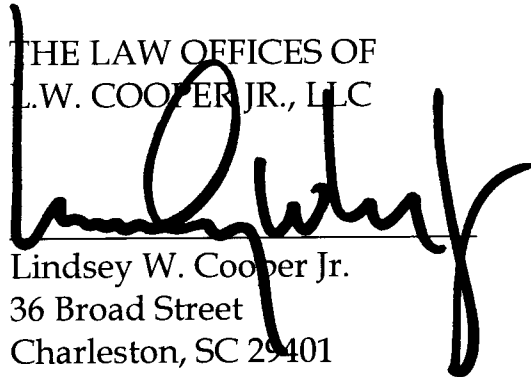
Appellant hereby moves that this appeal be stayed for good cause until the underlying case has been resolved. The underlying action is a foreclosure upon real property, and Respondent is the guarantor of the note and mortgage that are the basis of a foreclosure. Appellant is a lien holder in a dispute with another lien holder over who has first priority. Appellant's appeal, thus, is potentially moot depending upon the funds generated by a foreclosure sale and whether the Appellant is held to have first priority in the underlying case. Thus, this appeal should be stayed pending the disposition of the primary action as it may render the

instant appeal moot and would be in the interests of judicial economy.

We have contacted opposing counsel regarding this motion, and opposing counsel does not consent to this motion.

November 20, 2014

THE LAW OFFICES OF
L.W. COOPER JR., LLC



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PROOF OF SERVICE

I certify that I have served the Motion to Stay Appeal on Raymond Travaglione by depositing a copy of it in the United States Mail, postage prepaid, on November 20, 2014, addressed to his attorney of record, Tara E. Nauful, 211 King Street, #330 Charleston, SC 29401.

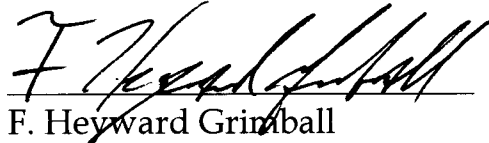
November 20, 2014

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THE LAW OFFICES OF
L.W. COOPER JR., LLC

A handwritten signature in black ink, appearing to read "F. Heyward Grinball", written over a horizontal line.

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*Counsel to Daufuskie Island
Properties, LLC, and its successor in
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F. HEYWARD GRIMBALL

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November 20, 2014

VIA FIRST CLASS MAIL

Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

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NOV 24 2014

SC Court of Appeals


Re: JMT Cap. Hldgs, LLC v. VDM/T Land Co., et al., LLC,
Appellate Case No. 2014-002290.

To Whom It May Concern:

Enclosed please find an original and a copy of Defendant Daufuskie Island Properties, LLC and its successor in interest, Ace Basin Investments, LLC's correspondence with the Beaufort County Court Reporter. In reviewing the rule it has come to my attention that I was six days late in ordering the transcript, thus please find attached an original and seven copies of a Motion to Order the Transcript out of Time. Lastly, please also find the Appellant's Motion to Stay the Appeal Pending the Disposition of the Underlying Action and seven copies of the same. Please time stamp one copy of each motion and the correspondence and return them to this office in the prepaid, preaddressed envelope enclosed. If you have questions, please contact me at 843.375.6622.

Many thanks.

Sincerely,


F. Heyward Grimball

Enclosure: As stated

cc (via First-Class Mail with enclosures):

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