

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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MAY 05 2015

SC Court of Appeals

75886

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

Larry B. Hyman, Jr., Circuit Court Judge

CASE NO. 2013-CP-22-001231

MELANIE J. NEWMAN, MELISSA J. ARCE, WINONA M. NEWMAN,
AND CHRISTOPHER J. NEWMAN..... Appellants

vs.

VIRGINIA K. NEWMAN, INDIVIDUALLY AND VIRGINIA K. NEWMAN,
AS PERSONAL REPRESENTATIVES OF THE ESTATE OF
JOHN PERCY NEWMAN..... Respondent

IN RE: ESTATE OF JOHN PERCY NEWMAN

And

VIRGINIA K. NEWMAN, INDIVIDUALLY AND VIRGINIA K. NEWMAN,
AS PERSONAL REPRESENTATIVES OF THE ESTATE OF
JOHN PERCY NEWMAN..... Respondent

vs.

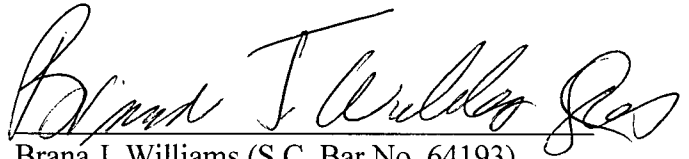
MELANIE J. NEWMAN, MELISSA J. ARCE, WINONA M. NEWMAN,
AND CHRISTOPHER J. NEWMAN..... Appellants

IN RE: ESTATE OF JOHN PERCY NEWMAN

**NOTICE OF MOTION AND MOTION
TO STAY DEADLINES ON APPEAL**

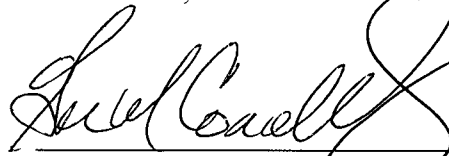
You will please take notice the undersigned moves to stay the appeal deadlines in
this case bed on the attached Memorandum.

WILLIAMS LAW FIRM, LLC



Brana J. Williams (S.C. Bar No. 64193)
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KELAHER, CONNELL & CONNOR, P.C.



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gconnell@classactlaw.net

Attorneys for Appellants

April 30, 2015
Surfside Beach, South Carolina

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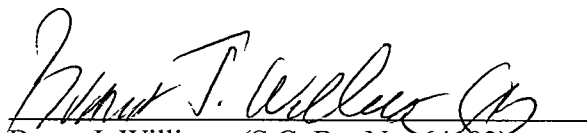
**MEMORANDUM OF LAW IN SUPPORT OF
MOTION TO STAY DEADLINES ON APPEAL**

The Appellants Melanie J. Newman, Melissa J. Arce, Winona M. Newman, and
Christopher J. Newman have appealed the above captioned probate case. Respondent

Virginia Newman had filed a motion to sell certain probate assets. A hearing was held on Appellants' supersedeas motion and Respondent's motion to sell assets on April 24, 2015 in the Georgetown County Circuit Court. At the hearing, Respondent's counsel requested more time since he had only been served with the supersedeas motion on April 23, 2015. Appellants' counsel agreed to a continuance at which time the Court set the matter on the non-jury roster for July 16-17, 2015 before Judge William Seals.

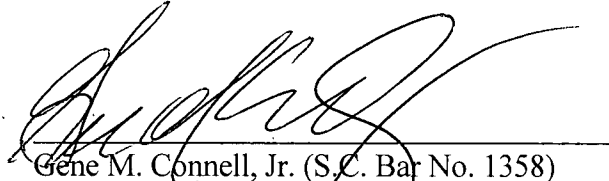
Appellants' Initial Brief is to be filed by May 11, 2015 in this Court. Appellants request the time for filing the brief be stayed until after the supersedeas motion can be heard by the Circuit Court. This request is based on the fact that the decision on the supersedeas will directly impact the brief on appeal in this case. Further, Appellants will be prejudiced in having to file the brief prior to the ruling on the supersedeas since Appellants' legal strategy will be affected by this ruling. Also, Appellants may have to file a supersedeas before this Court once the Circuit Court issues its ruling. Accordingly, Appellants request all deadlines be stayed.

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vs.

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IN RE: ESTATE OF JOHN PERCY NEWMAN

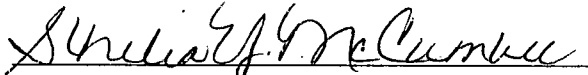
PROOF OF SERVICE

PERSONALLY appeared before me, Shelia Y. McCumbee, who being duly sworn, deposes and says that she is an employee of KELAHER, CONNELL & CONNOR, P.C., Attorneys at Law, and that she has served a **Notice of Motion and Motion to Stay Appeal Deadlines and Memorandum of Law in Support of Motion to Stay Deadlines on**


Appeal on the Respondent, through her attorney of record, by depositing a copy of same in the United States Mail, postage prepaid, to:

Charles O. Nation, II, Esquire
NATION LAW FIRM
Post Office Drawer 1657
Georgetown, SC 29442

DATE OF MAILING: April 30, 2015


Shelia Y. McCumbee

SWORN AND SUBSCRIBED before me,
this 30th day of April, 2015.


Notary Public for South Carolina
My Commission Expires: 6/11/24

KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

SUITE 209

THE COURTYARD

1500 U.S. HIGHWAY 17 NORTH

P.O. DRAWER 14547

SURFSIDE BEACH, SOUTH CAROLINA 29587

EDWARD T. KELAHER*
GENE M. CONNELL, JR.
L. SIDNEY CONNOR, IV
LISA POE DAVIS

* OF COUNSEL

AREA CODE 843

238-5648

FAX: 238-5050

April 30, 2015

RECEIVED

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SC Court of Appeals

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

Re: Appellate Case No. 2015-000873

Melanie J. Newman, Melissa J. Arce, Winona M. Newman and Christopher J. Newman In Re: Estate of John Percy Newman vs. Virginia K. Newman, Individually and Virginia K. Newman, As Personal Representatives of The Estate Of John Percy Newman

AND

Virginia K. Newman, Individually and Virginia K. Newman, As Personal Representatives of The Estate Of John Percy Newman V. Melanie J. Newman, Melissa J. Arce, Winona M. Newman and Christopher J. Newman In Re: Estate of John Percy Newman

Case No. 2013-CP-22-1231

Our File No. 2015-105-C

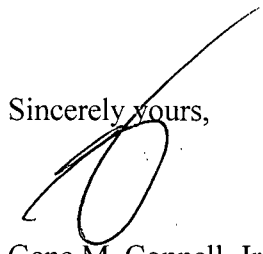
Dear Ms. Kitchings:

Enclosed please find an original and seven (7) copies of a Notice of Motion and Motion to Stay Deadlines on Appeal and Memorandum of Law in Support of Motion to Stay Deadlines on Appeal and Proof of Service in the above-captioned matter. I also enclose a check for \$25.00 for the filing fee. Please return a filed copy to me in the self-addressed, stamped envelope enclosed for your convenience.

By copy of this letter, we hereby serve a copy of the above-stated documents on counsel of record.

With best regards, I am

Sincerely yours,



Gene M. Connell, Jr.

GMC,Jr.:sm

Enclosures

cc with enc.: Charles O. Nation, II, Esquire



KELAHER, CONNELL & CONNOR, P.C.

ATTORNEYS AT LAW

P. O. DRAWER 14547

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