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THE STATE OF SOUTH CAROLINA  
In The Court Of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Joseph M. Strickland, Master-in-Equity

Appellate Case No. 2015-000367

**RECEIVED**  
AUG 05 2015  
SC Court of Appeals

Royals Portfolio, LLC, an assignee of  
Bank of America, N.A., formerly known as  
NationsBank, N.A., which is Successor in  
Merger to NCNB South Carolina, .....Respondent,

v.

Charlie Kelley and Dorothy Simpson, ..... Appellants.

MOTION TO HOLD APPELLATE TIMELINES IN ABEYANCE

The Appellant Dorothy Simpson filed a petition for relief under Chapter 13 of the U.S. Bankruptcy Court on May 1, 2015, approximately two and a half months after commencement of this appeal. On July 21, 2015, the Bankruptcy Court entered a Consent Order converting Ms. Simpson's case to Chapter 7 for cause. The Chapter 7 Trustee filed a Motion to Stay this appeal on August 5, 2015. Respondent, Royals Portfolio, LLC, moves to hold the timeline for its Initial Brief of Respondent (which is due August 7, 2015) in abeyance pending this Court's decision on the motion to stay. If this Court denies the Trustee's motion to stay, Royals Portfolio, LLC moves that its Initial Brief of Respondent be ordered to be served and filed within thirty (30) days after the order denying the motion to stay.

Based upon these extraordinary circumstances, Respondent respectfully requests this motion be granted.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Paul D. Harrill", is written over a horizontal line.

Paul D. Harrill  
McNair Law Firm. P.A.  
Post Office Box 11390  
Columbia, South Carolina  
Attorneys for Respondent

August 5, 2015  
Columbia, SC

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CERTIFICATE OF SERVICE

I, Ann Shuler, an employee of McNair Law Firm, certify that I served the Respondent's Motion to Hold Appellate Timelines in Abeyance this 5<sup>th</sup> day of August, 2015, by placing a true and correct copy in the U.S. Mail, sufficient postage pre-paid to counsel for the Respondent at the following address:

Kathleen Chewning Barnes, Esquire  
Barnes Law Firm, LLC  
Post Office Box 897  
Hampton, South Carolina 29924

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Phillip A. Curiale  
The Law Offices of Brian L. Boger  
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Ann Shuler