

70957

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

RECEIVED

AUG 17 2015

Charles B. Simmons, Circuit Court Judge

SC Court of Appeals

Case No. 2013-CP-23-01715

Michael Stehney, Jr.,

Respondent,

v.

Ronald E. Ferguson, Susan M. Ferguson and
Ronald J. Ferguson,

Appellant,

Case No. 2013-CP-23-03179

Ronald E. Ferguson and Susan M. Ferguson,

Respondent,

v.

Christopher Todd Usher, Addison Corporation and
Addison Homes, LLC,

Respondent.

rac

NOTICE OF APPEAL


Ronald J. Ferguson appeals the Order of the Master-in-Equity Charles B. Simmons, Jr., dated July 24, 2015, and received via United States Postal Service on July 28, 2015, in the above styled consolidated cases. Appellant would respectfully submit the interlocutory order is ripe for review

pursuant to S.C. Code § 14-3-330(2) where the lower court's conduct prior conduct in violating U.S. Code §1446(d) by Order dated November 6, 2014, has continued with contravention of established United States Supreme Court precedent which has affected a substantial right, the right to pursue a defense as defined in S.C. Code 15-38-15(D).

Among several secondary matters subject to review would be the Master-in-Equity's Order directing that Appellant allow an inspection of a residence which he is partial owner and appear for deposition in the 2013-CP-23-03179 matters when: A) Appellant did not receive prior notices pursuant to SCRCF, was not served, named or otherwise represented in the Motion to Compel or given adequate opportunity to address such matters raised; B) The Master-in-Equity failed to disclose the fact he had been engaged in dialogue with opposing counsel and/or other third parties without knowledge of appellant; and C) that communication is relevant to the Court's conduct in violation of S.C. Code §40-59-190 and decision to have hearing and subsequent Order violating S.C. Code § 40-1-190. Appellant would assert that complying with the Order would be a violation of established law and State practices, cause irreversible damage, render certain claims moot, and affect the rights of the State of South Carolina to maintain their policies and practices regarding due process in administrative matters.

Respectfully submitted,

August 14, 2015



Ronald J. Ferguson
103 Mill Creek Road
Piedmont, South Carolina 29673
864-509-0169

Other Counsel of Record:
Patterson & Associates, P.A.
Nathaniel C. Farmer
1088 North Church Street
Greenville, SC 29601

Chace Campbell, P.A.
Chace M. Campbell
12 East Stone Street
Greenville, SC 29609

Murphy & Grantland, P.A.
Brent M. Boyd
PO BOX 6648
Columbia, SC 29260

Brown, Massey, Evans, McLeod & Haynsworth, LLC
E. Zachary Horton
106 Williams Street
Greenville, SC 29602

THE STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Charles B. Simmons, Circuit Court Judge

Case No. 2013-CP-23-01715

RECEIVED

AUG 17 2015

SC Court of Appeals

Michael Stehney, Jr.,

Respondent,

v.

Ronald E. Ferguson, Susan M. Ferguson and
Ronald J. Ferguson,

Appellant,

Case No. 2013-CP-23-03179

Ronald E. Ferguson and Susan M. Ferguson,

Respondent,

v.

Christopher Todd Usher, Addison Corporation and
Addison Homes, LLC,

Respondent.

CERTIFICATE OF SERVICE

I certify, that on this date, I served a copy of the Notice of Appeal, dated 03/35/2015 on Respondent's Attorneys of record by

_____ delivering it to him/her personally; or,

_____ mailing it to him/her, at his/her last known address, by depositing it in the U.S. Mail, in an envelope with sufficient postage affixed, addressed as follows; or,

X mailing it to the address indicated by their counsel of record as follows:

Patterson & Associates, P.A.
Nathaniel C. Farmer
1088 North Church Street
Greenville, SC 29601

Chace Campbell, P.A.
Chace M. Campbell
12 East Stone Street
Greenville, SC 29609

Murphy & Grantland, P.A.
Brent M. Boyd
PO BOX 6648
Columbia, SC 29260

Brown, Massey, Evans, McLeod & Haynsworth, LLC
E. Zachary Horton
106 Williams Street
Greenville, SC 29602

This the 14 day of August, 2015.



Ronald J. Ferguson

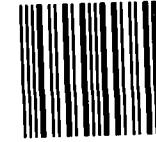
Ronal
103 Mi
Piedm



29073



1000



29211

U.S. POSTAGE
PAID
GREENVILLE, SC
29604
AUG 14, 15
AMOUNT

\$1.64

R2304N117906-10

RECEIVED

AUG 17 2015

SC Court of Appeals

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