

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM Horry COUNTY
Court of Common Pleas

J. Derham Cole, Circuit Court Judge

Case No. 2014-CP-26-04888

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MAR 01 2016
SC Court of Appeals

Carroll A. Campbell, III, and John D. Cattano Respondents,

v.

Triton Stone Group, LLC, Triton Stone Management, LLC
Triton Stone Southaven, LLC, Joshua Kessler, Randy Mathis,
Gary Sena, Triton Stone Group New Orleans, LLC, Christian
Jensen, and Jack Jensen Appellants.

Appellate Case No. 2016-000233

**APPELLANTS' RESPONSE TO COURT'S CORRESPONDENCE DATED FEBRUARY
19, 2016 REQUESTING MEMORANDUM ADDRESSING ISSUE OF APPEALABILITY**


Triton Stone Group, LLC, Triton Stone Management, LLC, Triton Stone Southaven, LLC, Joshua Kessler, Randy Mathis, Gary Sena, Triton Stone Group New Orleans, LLC, Christian, Jensen, and Jack Jensen Triton Stone Group New Orleans, LLC, Christian Jensen and Jack Jensen (collectively, "Appellants"), by and through their undersigned counsel, hereby submit this Response to the Court's Correspondence to counsel dated February 19, 2016 Requesting Memorandum Addressing issue of Appealability ("February 19 Correspondence").

By Text Order entered on February 26, 2016 in the Adversary Proceeding *Anderson v. Campbell, et al.*, (*In re Congaree Triton Acquisitions, LLC*), Adv. Pro. No. 15-80147-jw (Bankr. D.S.C. February 26, 2016) ("Bankruptcy Case") [Doc. No. 33], a true and correct copy of which

is attached hereto as Exhibit 1, the Bankruptcy Court issued its Order staying, on an interim basis, all actions related to the Bankruptcy Case.

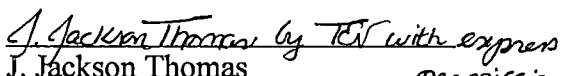
Inasmuch as the issues raised in this appeal are related to the Bankruptcy Case, the automatic stay of 11 U.S.C. § 362(a) and the aforementioned Text Order prevent Appellants from further prosecution of this appeal until further Order of the Bankruptcy Court.

Respectfully submitted,



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Attorneys for Triton Stone Group New Orleans,
LLC, Christian Jensen and Jack Jensen


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And

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Attorneys for Triton Stone Group, LLC; Triton
Stone Management, LLC; Triton Stone Southaven,
LLC; Joshua Kessler; Randy Mathis; Gary Sena;

March 1, 2016

Tara E. Nauful

EXHIBIT

tabbiter

1

From: SCB_ECF_NEF@scb.uscourts.gov
Sent: Friday, February 26, 2016 3:02 PM
To: Courtmail@scb.uscourts.gov
Subject: 15-80147-jw Order - CH - Congaree Triton Acquisitions, LLC et al v. Campbell, III et al

NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

United States Bankruptcy Court
District of South Carolina

Notice of Electronic Filing

The following transaction was received from Powell, A entered on 2/26/2016 at 3:01 PM EST and filed on 2/26/2016

Case Name: Congaree Triton Acquisitions, LLC et al v. Campbell, III et al
Case Number: 15-80147-jw <https://ecf.scb.uscourts.gov/cgi-bin/DktRpt.pl?263810>

Document Number: 33

Copy the URL address from the line below into the location bar of your Web browser to view the document:
https://ecf.scb.uscourts.gov/doc1/1620?pdf_header=&magic_num=38501484&de_seq_num=145&caseid=263810

Docket Text:

Based on the findings and conclusions stated on the record, the Court declines to abstain in this proceeding and finds that the automatic stay under 11 U.S.C. Â§ 362 and Order of this Court prohibits on an interim basis any further proceedings in all related actions pending in the South Carolina state court, including Civil Action No. 2014-CP-26-04888 and Appellate Case No. 2016-000233. This Order may be supplemented by a further order of this Court. AND IT IS SO ORDERED. Signed by: Judge John E. Waites, US Bankruptcy Court - District of South Carolina (related document(s)[20]). (Powell, A)

The following document(s) are associated with this transaction:

15-80147-jw Notice will be electronically mailed to:
Robert F. Anderson
firm@andersonlawfirm.net, randerson@ecf.epiqsystems.com

John B. Butler, III on behalf of Interested Party Triton Stone Group, LLC
jbbiii@bellsouth.net

Marilyn E. Gartley on behalf of Plaintiff Robert F. Anderson marilyn@andersonlawfirm.net, lorjanth@andersonlawfirm.net

Henrietta U Golding on behalf of Defendant Carroll A. Campbell, III hgolding@mcnair.net, ckoerner@mcnair.net

Henrietta U Golding on behalf of Defendant John D. Cattano hgolding@mcnair.net, ckoerner@mcnair.net

Tara E. Nauful on behalf of Creditor Triton Stone New Orleans, LLC
tara.nauful@arlaw.com, candice.carter@arlaw.com; Ashley.jordan@arlaw.com

15-80147-jw Notice will not be electronically mailed to:

Congaree Triton Acquisitions, LLC
1813 Marion St
Columbia, SC 29201

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In the Court of Appeals

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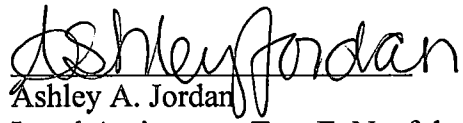
Triton Stone Group, LLC, Triton Stone Management, LLC
Triton Stone Southaven, LLC, Joshua Kessler, Randy Mathis,
Gary Sena, Triton Stone Group New Orleans, LLC, Christian
Jensen, and Jack Jensen Appellants.

PROOF OF SERVICE

I, the undersigned, do hereby certify that on March 1, 2016, I caused the below named parties to be served with a copy of the Appellant's Response to Court's Correspondence Dated February 19, 2016 Requested Memorandum Addressing Issue of Appealability by causing said document to be placed in a sealed envelope with postage thereon fully prepaid, in the United States mail, with return address clearly shown, as set forth below:

Henrietta U. Golding, Esq.
Lane D. Jefferies, Esq.
McNair Law Firm, PA
2411 N. Oak Street, Suite 206
Myrtle Beach, SC 29577

*Attorneys for Respondents Carroll A. Campbell, III,
and John D. Cattano*



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March 1, 2016

ADAMS AND REESE LLP

Attorneys at Law

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Florida
Louisiana
Mississippi
South Carolina
Tennessee
Texas
Washington, DC

Tara E. Nauful

Admitted in South Carolina,
North Carolina, and Georgia
Certified Bankruptcy Specialist by
the South Carolina Supreme Court
Direct: 803.212.4408

March 1, 2016

Via Hand-Delivery

The Honorable Jenny Abbott Kitchings
Clerk of Court
South Carolina Court of Appeals
1015 Sumter Street
Columbia, South Carolina 29201

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SC Court of Appeals

RE: *Carroll A. Campbell, III and John D. Cattano, Respondents v. Triton Stone Group, LLC, Triton Stone Management, LLC, Triton Stone Southaven, LLC, Joshua Kessler, Randy Mathis, Gary Sena, Triton Stone Group New Orleans, LLC, Christian Jensen and Jack Jensen, Appellants*
Horry County Case No.: 2014-CP-26-04888
Appellate Case No. 2016-000233
Adams and Reese File No.: 015120-000009

Dear Ms. Kitchings:

Please find enclosed for filing the original and one (1) copy of Appellants' Response to Court's Correspondence dated February 19, 2016 Requesting Memorandum Addressing Issue of Appealability, along with Proof of Service of same.

Please have someone from your office file the originals and return the filed copies to me with my courier.

If you have any questions, please feel free to contact me. Thank you for your assistance in this matter.

Sincerely,



Tara E. Nauful

Enclosures (as stated)

c: Henrietta U. Golding, Esq.
Lane D. Jefferies, Esq.
J. Thomas Jackson, Esq. (via e-mail)
Halsey G. Knapp, Jr., Esq. (via e-mail)