

**THE CARTER LAW FIRM**

105 South Brooks Street

P.O. Box 187

Manning, South Carolina 29102

(803) 435-0550

Fax (803) 435-0551

**Eleazer R. Carter**  
Attorney at Law

Reply To:  
Manning Office

March 15, 2016

The Honorable Jenny A. Kitchings, Deputy  
The South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

**RECEIVED**

MAR 17 2016

**SC Court of Appeals**

RE: H. Thad White v. Petrel International, LLC  
Appellate Case No: 2014-002767  
In Re: Amended Proof of Service

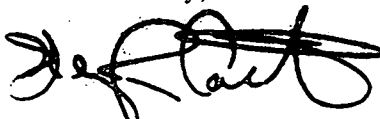
Dear Ms. Kitchings:

Please find enclosed a copy of the Notice of Motion to Stay Lower Court Judgment Granting a Special Referee Deed and Writ of Assistance and the corrected Certificate of Service.

By copy of this letter and notice to opposing counsel, I am forwarding the same.

Thank you for your attention to this matter. If you have any questions or concerns, please do not hesitate to contact this office.

Sincerely,



Eleazer R. Carter

ERC/bnb  
Enclosure(s)  
Cc: Bryan W. Braddock, Esquire

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STATE OF SOUTH CAROLINA  
IN THE SOUTH CAROLINA COURT OF APPEALS

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H. THAD WHITE, RESPONDENT

v.

PETREL INTERNATIONAL, LLC, APPELLANT

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MAR 17 2016

SC Court of Appeals

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APPELLATE CASE NUMBER: 2014-002764

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CERTIFICATE OF SERVICE

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I, Brittany Bell, of The Carter Law Firm, hereby certify that I along with Eleazer Carter served a copy of the below mentioned document(s) upon the following parties, by depositing the same in the United States mail, with proper postage prepaid and affixed thereto, addresses as follows, 11<sup>th</sup> day of March 2016 and again on the 15<sup>th</sup> day of March 2016.

Document(s) Served:

Notice of Motion to Motion to Stay Lower Court Judgment Granting a Special Referee Deed and Writ of Assistance

Parties Served:

Bryan W. Braddock, Esquire  
The Braddock Law Firm, LLC  
2231 West Palmetto Street, Suite 203  
Florence, South Carolina 29501

*Brittany Bell*

---

Brittany Bell, Legal Assistant  
105 South Brooks Street  
Post Office Box 187  
Manning, South Carolina 29102  
Tel No.: 803-435-0550  
Fax No.: 803-435-0551

Manning, South Carolina  
March 15, 2016

STATE OF SOUTH CAROLINA  
IN THE SOUTH CAROLINA COURT OF APPEALS

H. THAD WHITE, RESPONDENT,  
V.  
PETREL INTERNATIONAL, LLC, APPELLANT.

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SC Court of Appeals

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APPELATE CASE NUMBER : 2014-002764  
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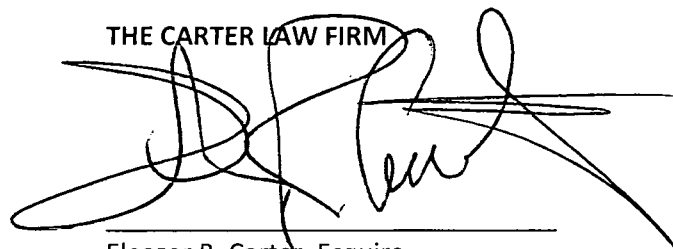
**NOTICE OF MOTION TO STAY LOWER COURT JUDGMENT  
GRANTING  
A SPECIAL REFEREE DEED AND WRIT OF ASSISTANCE**

**YOU WILL PLEASE TAKE NOTICE** that the Appellant will move the Court in a motion to Stay Lower Court Judgment Granting a Special Referee Deed and Writ of Assistance. The motion will be based on the fact that the Special Referee has indicated and in-fact issued a Special Referee Deed and in-fact issued a Writ of Assistance directing the Darlington County Sheriff to assist in removing the Appellant off the property despite this pending appeal. Further, no prejudice, harm or burdened has been nor will be created on the Respondent.

A copy of the same is being provided or has been provided to all parties in this matter.

**I SO MOVE ON BEHALF OF THE APPELLANT.**

THE CARTER LAW FIRM



Eleazer R. Carter, Esquire  
South Carolina Bar No.: 012032  
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Manning, South Carolina 29102  
Tel. No.: 803-433-0550  
Fax No.: 803-435-0551  
e-mail: [eleazercarter@aol.com](mailto:eleazercarter@aol.com)

Manning, South Carolina  
March 11, 2016

The Carter Law Firm  
105 South Brooks Street  
Post Office Box 187  
Manning, South Carolina 29102

15 MAR 2016 PM 4 1



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MAR 17 2016

SC Court of Appeals

The Honorable Jenny A. Kitchings, Deputy  
The South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, South Carolina 29211

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