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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

DeAndrea Gist Benjamin, Circuit Court Judge

RECEIVED

MAY 11 2016

SC Court of Appeals

Case No. 2016-000211

Kim Murphy Appellant

v.

Richland-Lexington School District No. 5 by and through its Board of Trustees by
And through Counsel to the Board of Trustees, Respondent.

MOTION TO STAY

The Appellant, Kim Murphy, through her undersigned counsel, hereby requests of this Honorable Court to hold in abeyance the above referenced matter. The Appellant seeks an abeyance because she anticipates filing a Motion for Consolidation. Appellant is awaiting a decision on her Motion for Reconsideration in a second case, which is currently pending before the Richland County Court of Common Pleas. The present appeal and the pending circuit court case involve the same questions of law and substantially the same parties; including the Respondent and two Individual Defendants. Appellant anticipates filing a Notice of Appeal should her Motion for Reconsideration be denied and she will subsequently seek to consolidate the two appeals.

Pursuant to these grounds, the undersigned respectfully requests this Honorable Court to

hold the present appeal in abeyance until the second case is ripe for appeal. The undersigned certifies that this motion is not being done as a delaying tactic and is in the furtherance of justice, efficiency, and judicial economy. The undersigned counsel consulted with counsel for Respondent and they do not oppose the Motion.

J. LEWIS CROMER & ASSOCIATES, L.L.C.

BY: _____



J. Lewis Cromer (#1470)

Chelsea R. Rikard (#102355)

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Phone 803-799-9530

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May 10, 2016

Attorneys for Appellant

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PROOF OF SERVICE

This is to certify that the undersigned employee of J. Lewis Cromer & Associates, LLC, did cause to have served on May 10, 2016, a copy of the **MOTION TO STAY** via First Class Mail, postage prepaid, to the following counsel of record, at the below indicated address:

John M. Reagle
Childs and Halligan, P.A.
The Tower at 1301 Gervais Street
Suite 900
PO Box 11367
Columbia, SC 29211



Chelsea R. Rikard
J. Lewis Cromer & Associates, LLC
1418 Laurel Street
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Columbia, South Carolina 29211
Phone 803-799-9530

May 10, 2016
Columbia, SC

**J. LEWIS CROMER
& ASSOCIATES L.L.C.**

ATTORNEYS AND COUNSELORS AT LAW

J. Lewis Cromer
Julius W. Babb, IV · J. Paul Porter
Ryan K. Hicks · Shannon M. Polvi · Chelsea R. Rikard

May 10, 2016

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SC Court of Appeals

Via Hand Delivery

Honorable Jenny Abbott Kitchings
Clerk of Court
S.C. Court of Appeals
1220 Senate Street
Columbia, SC 29201

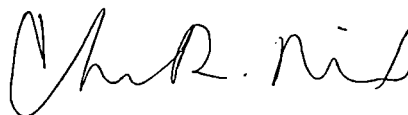
Re: Betty J. Keitt v. City of Columbia
Case No. 2012-CP-40-07273
Appellate Case No. 2014-000961

Dear Ms. Kitchings:

Enclosed please find one (1) original and (7) copies of our Motion to Stay in the above captioned matter. Also enclosed is the original of the Proof of Service. Please file and return the clocked copies to us via our courier.

Should you have any questions and/or concerns, please feel free to call us. Thank you in advance for your kind assistance in this matter.

Sincerely,



Chelsea R. Rikard

CC: John Reagle, Esq.