

IN THE STATE OF SOUTH CAROLINA

In the South Carolina Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

R. Knox McMahon, Circuit Court Judge

Case No. 2013-CP-38-00994

Appellate Case No. 2016-001807

**RECEIVED**

OCT 13 2016

SC Court of Appeals

Denetra Glover..... Respondent.

v.

William Shervon Stack and Shervon Latrese Simpson,

Of whom

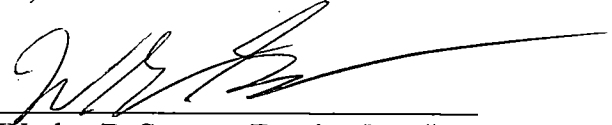
Shervon Latrese Simpson.....Appellant.

**MOTION TO CONSOLIDATE**

Appellant Shervon Latrese Simpson moves pursuant to Rule 214, SCRAP for an Order consolidating this matter and the appeal in Appellate Case No. 2016-001809, captioned Shirley Davis v. William Shervon Stack and Shervon Latrese Simpson. Both matters arise out of the same automobile accident, and both matters deal with the same question of law. Moreover, the Circuit Court held the hearing on the underlying motions in both matters at the same time. Also, with the exception of the name of the plaintiffs and the amount of money the plaintiffs received in settlements with the co-defendant, the Orders appealed from in the two cases are virtually identical.

For the above-stated reasons, Appellant respectfully moves for an Order consolidating these two appeals. Counsel for Appellant has communicated with Counsel for Respondent, and Counsel for Respondent consents to the consolidation.

Respectfully submitted this 12<sup>th</sup> day of October, 2016.



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Other Counsel of Record:

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250 Gibson Street (29115)  
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Attorney for Respondent

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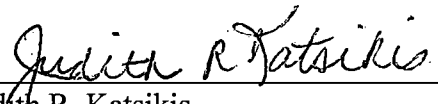
Shervon Latrese Simpson.....Appellant.

**CERTIFICATE OF SERVICE**

I, the undersigned employee of the law offices of Murphy & Grantland, P.A., Attorneys for Plaintiff, do hereby certify that I have served a copy of Motion to Consolidate along with a copy of the defendant's Answer, in connection with the above-referenced case by mailing a copy of the same by United States Mail, postage prepaid, to the following address(es):

Shane M. Burroughs  
David C. Marshall  
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Attorney for Respondent

  
\_\_\_\_\_  
Judith R. Katsikis

Columbia, South Carolina  
October 12, 2016



MURPHY & GRANTLAND, P.A.

Wesley B. Sawyer  
Direct dial 803-454-1233  
wsawyer@murphygrantland.com

October 12, 2016

Honorable Jenny Abbott Kitchings  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

Re: Shirley Davis vs. William Shermon Stack and Shervon Latreese Simpson  
Civil Action No.: 2013-cp-38-00992  
Claim No.: 391201348  
Date of Loss: 03-10-12  
Our File No.: 2100-0494

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Dear Ms. Abbott-Kitchings:

Enclosed please find the original and 8 (8) copies of the Motion to Consolidate with regard to the above-referenced matter, along with Certificate of Service. Also, enclosed please find my firm's check in the amount of \$25.00 for filing of same. It would be most appreciated if you would file the original and return two filed copies to me in the envelope provided. By copy of this correspondence, I am serving same on opposing counsel.

With warm personal regards, I am

Sincerely yours,

Wesley B. Sawyer

WBS/jrk  
Enclosures

cc: Shane M. Burroughs, Esquire.  
David Marshall, Esquire  
Honorable Winnifa Brown-Clark, Clerk  
Karl Davis (*vis email*)

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