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MAR 06 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LANCASTER COUNTY
Court of Common Pleas

G. Thomas Cooper, Circuit Court Judge

Appellate Case No. 2016-002248

Travis Roddey, individually and as the Personal Representative of the Estate of Alice Monique Beckham Hancock, Deceased. Appellant,

V.

Wal-Mart Stores East, L.P., U.S. Security Associates, Inc., and Derrick L. Jones
..... Respondents,

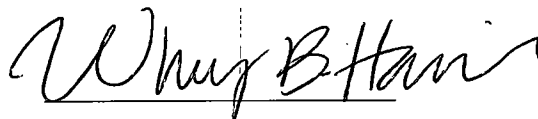
MOTION TO STAY APPEAL

Pursuant to Rules 240 and 263, SCACR, Appellant request this Court issue an order holding the deadlines for filing the initial briefs in abeyance until the Supreme Court determines whether it will certify this matter. On January 3, 2017, Appellant filed a motion for certification with the South Carolina Supreme Court seeking the Court's review. The subject of this appeal is the scope of relief granted by the Supreme Court in its 2016 opinion, *Roddey v. Wal-Mart Stores East, LP*, Op. No. 7615 (Shearouse Adv. Sh. No. 13, p. 31).

Appellant wishes to avoid incurring additional expenses associated with briefing this matter to both appellate courts. He therefore requests the Court issue an order staying the deadline until the Supreme Court determines whether it will certify this matter. Moreover, Appellant requests that the deadline for filing his initial brief, March 18, 2017 per the February 1, 2017 motion filed by Appellant, be held in abeyance until the Court decides on this motion.



Respectfully submitted,

A handwritten signature in black ink that reads "Whitney B. Harrison". The signature is written in a cursive style with a horizontal line underneath the name.

March 6, 2017
Columbia, SC

Whitney B. Harrison
McGowan, Hood & Felder, LLC
1517 Hampton Street
Columbia, SC 29201
(803) 779-0100
wharrison@mcgowanhood.com
ATTORNEY FOR APPELLANT

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V.

Wal-Mart Stores East, L.P., U.S. Security Associates, Inc., and Derrick L. Jones.....
..... Respondents,

PROOF OF SERVICE

The undersigned hereby certifies that on March 6, 2017, she served counsel for Respondent
with the *Motion to Stay Appeal* in this matter by mailing a copy of the same by United States Mail
with first class postage prepaid to the following addresses:

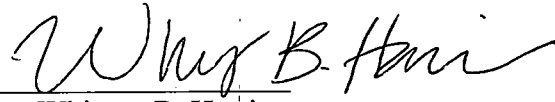
Howard Boyd
P.O. Box 10589
Greenville, SC 29603

Stephanie G. Flynn
Smith Moore Leatherwood LLP
2 West Washington Street, Suite 1100
Greenville, SC 29601

Signature Page to Follow

Respectfully submitted,

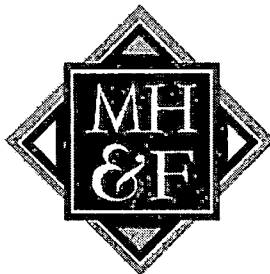
March 6, 2017
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March 6, 2017

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

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SC Court of Appeals

RE: *Travis Roddey, individually and as the Personal Representative of the Estate of Alice Monique Beckham Hancock, deceased v. Wal-Mart Stores East, L.P.; U.S. Security Associates, Inc., and Derrick L. Jones*
Appellate Case No. 2016-002248

Dear Ms. Kitchings,

I am writing to request this appeal be stayed until the South Carolina Supreme Court rules whether it will certify this matter. I ask that all filing deadlines be held in abeyance pending a decision on this motion.

Enclosed please find the original and seven (7) copies of Appellant's Motion for Extension. Please return a clocked copy of the Motion. I am also enclosing a check from our firm in the amount of \$25.00 to cover the filing fee for this motion. If you have any questions or concerns, please do not hesitate to contact me.

With kind regards, I am

Whitney B. Harrison

Enclosures

cc: Howard Boyd, Esquire
Stephanie Flynn, Esquire