

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

RECEIVED

MAY 31 2017

S.C. SUPREME COURT

---

APPEAL FROM LAURENS COUNTY  
Court of Common Pleas  
Frank R. Addy, Jr., Circuit Court Judge

---

In the Matter of the Estate of Marion M. Kay

Edward D. Sullivan, as Personal Representative  
of the Estate of Marion M. Kay, . . . . Petitioner/Respondent

v.

Martha Brown and Mary Moses, . . . . Respondents/Petitioners

Appellate Case No. 2016-002337

---

MOTION FOR ACCELERATED CONSIDERATION

---

PR7  
S.1

The undersigned counsel for Respondents/Petitioners hereby moves the Court to grant this appeal accelerated consideration. The undersigned is transitioning to retirement and if the motion is not granted, there is a substantial risk that the undersigned would have to hand the case over to another lawyer who is far less familiar with it than he is. This would prejudice Respondents/Petitioners. The granting of the motion would not prejudice Petitioner/Respondent, but rather would benefit him by reducing the amount of post-judgment interest he is likely to pay and by bringing this extended litigation and its expenses to an end.

*John R. Ferguson*

---

John R. Ferguson  
S.C. Bar No. 1987  
107 W. Laurens St. - PO Box 286  
Laurens, SC 29360  
(864) 984-212  
Fax (864) 984-7372

COX, FERGUSON & WHAM, LLC  
Attorneys for Respondents/Petitioners

May 25, 2017

JR7  
P.2

RECEIVED

MAY 31 2017

THE STATE OF SOUTH CAROLINA  
In the Supreme Court

S.C. SUPREME COURT

APPEAL FROM LAURENS COUNTY  
Court of Common Pleas  
Frank R. Addy, Jr., Circuit Court Judge

In the Matter of the Estate of Marion M. Kay

Edward D. Sullivan, as Personal Representative  
of the Estate of Marion M. Kay, . . . . Petitioner/Respondent

v.

Martha Brown and Mary Moses, . . . . Respondents/Petitioners

Appellate Case No. 2016-002337

CERTIFICATE OF SERVICE

The undersigned certifies that she is an employee at Cox  
Ferguson and Wham LLC and that on the 25 day of May, 2017  
she served the Motion for Accelerated Consideration herein by  
depositing a copy of it in the United States Mail, postage  
prepaid and addressed to:

Daryl G. Hawkins, Esq.  
Attorney at Law  
P.O. Box 11906  
Columbia, SC 29211.

*Dulvora Ball*

May 15, 2017