

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Charles B. Simmons, Jr., Greenville County Master-in-Equity

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AUG 25 2017
SC Court of Appeals

Case No. 2017-001379

John D. Hatcher, Rachel Shaluly, James F. Gilbert,
Molly A. Miller and Michael Stehney, individually
and as members of the Architectural Committee of
Mill Creek Estates,

Respondents

vs.

Ronald J. Ferguson, Ronald E. Ferguson and Susan M.
Ferguson,

Appellants.

RESPONDENTS' RESPONSE TO
APPELLANTS' MOTION TO RE-INSTATE

The Respondents believe that it was appropriate for the Court to dismiss the appeal as it has done before. The Appellants continue to appeal interlocutory (Motion to Compel Orders) and have been told by this Court before that it is inappropriate. They continue to do it and continue to frustrate and inhibit litigation.

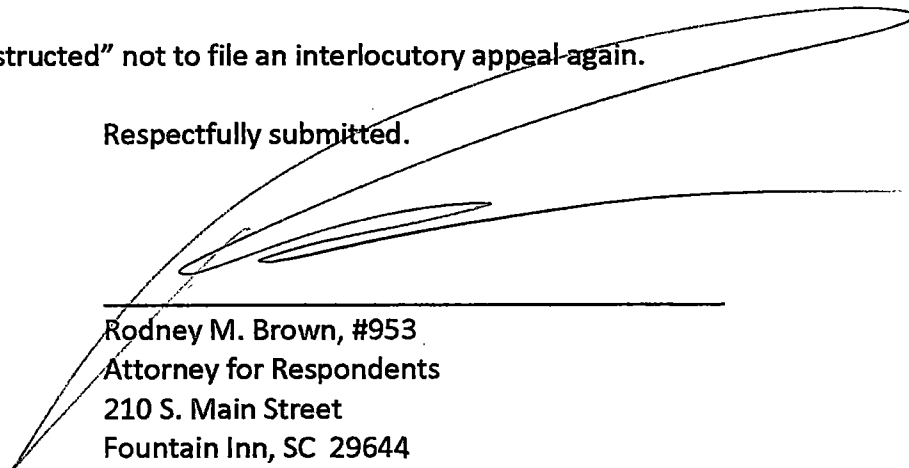
The Respondents are requesting that the Court of Appeals tell the Appellants that they are not allowed to do it again. That is what the 4th Circuit did with regard to their continual attempts to remove the case.

All the issues raised in their Motion to Re-Instate have nothing to do with this case. Alleged ex-party communications is denied and irrelevant. They are alleging this in another case. Disqualification of a Judge is irrelevant. It was a different Judge that they are talking about. The Appellants are talking about Judge Simmons and Judge Simmons hasn't heard this case.

The Appellants are talking about this being contrary to Federal law because of removal. The 4th Circuit has already told him that the Appellants are never allowed to come back to Federal Court and attempt removal again.

The Respondents respectfully request that the Motion to Re-Instate be denied and that the Appellants be "instructed" not to file an interlocutory appeal again.

Respectfully submitted.



Rodney M. Brown, #953
Attorney for Respondents
210 S. Main Street
Fountain Inn, SC 29644
(864) 862-2528

August 21, 2017

STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

Charles B. Simmons, Jr., Greenville County Master-in-Equity

Appellate Case No. 2017-001379

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Molly A. Miller and Michael Stehney, individually
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vs.

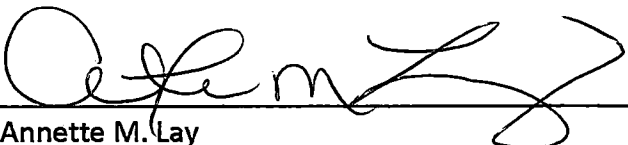
Ronald J. Ferguson, Ronald E. Ferguson and Susan M.
Ferguson,

Appellants.

CERTIFICATE OF SERVICE

The undersigned employee of Rodney M. Brown, P.A., counsel for John D. Hatcher, Rachel Shaluly, James F. Gilbert, Molly A. Miller and Michael Stehney, individually and as members of the Architectural committee of Mill Creek Estates, does hereby certify that service of the Respondents' Response to Appellants' Motion to Re-Instate was made upon Appellants by placing one (1) copy in the United States Mail, first class postage prepaid, at the below listed address clearly indicated on said envelope this 21st day of August, 2017.

Ronald J Ferguson Ronald E Ferguson and
Susan M Ferguson
103 Mill Creek Road
Piedmont SC 29673


Annette M. Lay

RODNEY M. BROWN PA
ATTORNEY AT LAW

August 22, 2017

RECEIVED

AUG 25 2017

SC Court of Appeals

The South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: John D. Hatcher, et al. vs. Ronald J. Ferguson, et al.
2017-001379

Dear Sir or Madam:

Enclosed herein please find the original and 6 copies of the Respondents' Response to Appellants' Motion to Re-Instate on the above-referenced case. By Certificate of Service, I am forwarding a copy to the Appellants.

As always, your time and cooperation is appreciated.

Sincerely,



Rodney M. Brown

aml

Enclosures

cc: Ronald J. Ferguson, Ronald E. Ferguson and
Susan M. Ferguson

RODNEY M. BROWN, PA

ATTORNEY AT LAW

210 S. Main Street • Fountain Inn, South Carolina 29644

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SC COURT of Appeals

