

84922

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

OCT 23 2017

SC Court of Appeals

Robert E. Hood, Circuit Court Judge

Case No. 2016-CP-40-04639

William A. Brazell,
Individually and as Personal
Representative of the Estate of
Geneva J. Brazell, deceased,

Appellant,

v.

Judith D. Haley,

Respondent.

MOTION FOR EXPEDITED HEARING

TO THE RESPONDENT ABOVE NAMED:

PLEASE TAKE NOTICE that Appellant, by and through his attorney, will move before the South Carolina Court of Appeals for an Order granting an expedited hearing in this matter.

ARGUMENT

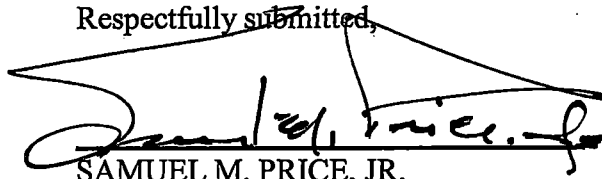
This case is intended to determine what interest each party has in certain real estate which consists of a lot and residence together with an adjacent lot with outbuildings. A Contract in Lieu of Deed was entered into by the parties on April 9, 2014. In the summer of 2014, the roof began to leak. A new roof was required. The cost of roofing the residence was covered by an

W.A.B.

insurance policy of appellant. Appellant's son is a roofer who was to roof subject residence. Respondent refused appellant and/or his son (the roofer) access to the residence. The residence has been leaking since that time. Upon information and belief, three (3) years of leakage has caused substantial damage to the residence. The undersigned would seek an expedited hearing in order to have this case remanded to the Richland County Master-in-Equity in order that the issues in this case may be resolved.

October 20, 2017

Respectfully submitted,



SAMUEL M. PRICE, JR.

Post Office Drawer 836

Newberry, South Carolina 29108

(803) 276-0796

Attorney for Appellant

RECEIVED

OCT 23 2017

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Robert E. Hood, Circuit Court Judge

Case No. 2016-CP-40-04639

William A. Brazell,
Individually and as Personal
Representative of the Estate of
Geneva J. Brazell, deceased,

Appellant,

v.

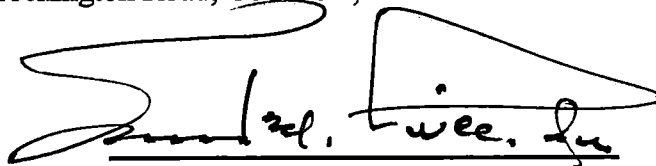
Judith D. Haley,

Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for Expedited Hearing on Judith D. Haley by depositing a copy of it in the United States Mail, postage prepaid, on October 20, 2017, addressed to her at 2428 Heyward Brockington Road, Columbia, South Carolina 29203.

October 20, 2017



SAMUEL M. PRICE, JR.
Post Office Drawer 836
Newberry, South Carolina 29108
(803) 276-0796
Attorney for Appellant

Law Office
of
Samuel M. Price, Jr.
1413 Main Street
P. O. Drawer 836
Newberry, South Carolina 29108

Fax
Area Code 803
276-9495

Telephone
Area Code 803

276-0796
RECEIVED

October 20, 2017

OCT 29 2017

SC Court of Appeals

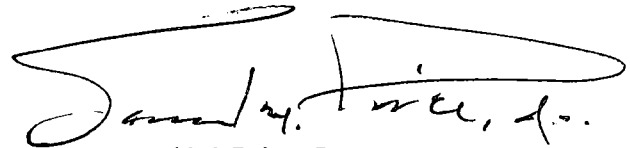
The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: William A. Brazell, Individually and as Personal Representative of the Estate of
Geneva J. Brazell, deceased vs. Judith D. Haley
Case No. 2016-CP-40-04639

Dear Ms. Kitchings:

Enclosed for filing are the original and one (1) copy of the Motion for Expedited Hearing together with Proof of Service of same on Respondent. Please return clocked copy to my office via enclosed envelope. I also check in the amount of Twenty-five and no/100 (\$25.00) dollars for the filing fee. If you have any questions, please do not hesitate to contact me.

Respectfully,



Samuel M. Price, Jr.

rfs

Enclosures

SAMUEL M. PRICE, JR.

ATTORNEY AT LAW

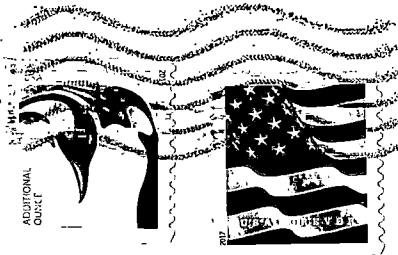
1413 MAIN STREET

P.O. DRAWER 836

NEWBERRY, SOUTH CAROLINA 29108

COLUMBIA, SC 290

21 OCT 2017 PM 1 1



The Honorable Jenny Abbott Kitchings
 Clerk, South Carolina Court of Appeals
 Post Office Box 11629
 Columbia, South Carolina 29211

RECEIVED

OCT 23 2017

SC Court of Appeals

29211-162929

