

IN THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

The Honorable Mikell R. Scarborough, Master-in-Equity

Case No.: 2017-001628

RECEIVED

JAN 03 2018

SC Court of Appeals

Ann M. BlandinRespondent-Appellant,

-v-

City of North CharlestonAppellant-Respondent.

RESPONDENT-APPELLANT'S MOTION TO STAY ALL DEADLINES

Respondent-Appellant, Ann Blandin ("Blandin") moves pursuant to Rule, 240, SCACR, to stay all deadlines pending a determination on Blandin's Motion to Dismiss Appellant-Respondent, The City of North Charleston's ("City") appeal. Blandin has contemporaneously filed a motion to dismiss the City's appeal. Staying all deadlines pending a determination on the motion will result in Blandin not having to re-submit her brief to take out dismissed portions in the event the motion is granted. For these reasons, Blandin's motion to stay should be granted.

[SIGNATURE TO FOLLOW ON NEXT PAGE]

Respectfully submitted,

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

January 2nd, 2018
Hampton, South Carolina

BY: 

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Attorneys for Respondent-Appellant

Other Counsel of Record:

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Charleston, SC 29402

Attorneys for Appellant-Respondent

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Ann M. BlandinRespondent-Appellant,

-v-

City of North Charleston, Appellant-Respondent.

CERTIFICATE OF SERVICE

This is to certify that I, *Megan C. Davis*, with the Law Firm of Peters, Murdaugh, Parker, Eltzroth & Detrick, P.A., Attorneys for the Respondent-Appellant, have this date mailed via the U.S. Postal Service with first class postage prepaid, a true and correct copy of the within the *Respondent-Appellant's Motion to Stay All Deadlines* to:

Robert H. Hood, Jr., Esquire
Deborah Harrison Sheffield, Esquire
Hood Law Firm, LLC
Post Office Box 1508
Charleston, SC 29402

William J. Horvath, Esquire
Turner Padgett Graham & Laney, PA
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Charleston, SC 29413

Megan C. Davis
Megan C. Davis

January 2nd, 2018
Hampton, South Carolina

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January 2, 2018

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The Honorable Jenny Abbott Kitchings
S.C. Court of Appeals Clerk of Court
Post Office Box 11629
Columbia, SC 29211-1629

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SC Court of Appeals

Re: Ann Blandin v. City of North Charleston
Appellate Case No.: 2017-001628

Dear Ms. Kitchings:

Please find enclosed the original and six (6) copies of Respondent-Appellant's Motion to Dismiss Appellant-Respondent's Appeal in the above-referenced case. Please file the original and return a clocked copy of same in the self-addressed stamped envelope provided.

Also, please find enclosed the original and six (6) copies of Respondent-Appellant's Motion to Stay All Deadlines in the above-referenced case. Please file the original and return a clocked copy of same in the self-addressed stamped envelope provided.

In addition, please find our checks in the amount of \$25.00 each (\$50.00 total) for the filing fees.

By copy of this letter, I am serving all counsel of record with a copy of the same.

With kind regards, I am

Sincerely,


John E. Parker

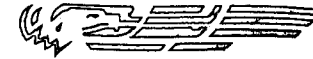
JEP/mcd

Enclosures as stated

cc: Robert H. Hood, Jr., Esquire
Deborah Harrison Sheffield, Esquire
Lawrence C. Kobrovsky, Esquire
William J. Horvath, Esquire



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S.C. Court of Appeals Clerk of Court
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