

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
Court of Common Pleas

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

Appellate Case No. 2018-001279

RECEIVED

NOV 29 2018

SC Court of Appeals

Michael Stehney, Jr., Respondents,

v.

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

Of whom Ron Ferguson, Ronald J. Ferguson, and Susan M. Ferguson are the Appellants.

MOTION

Comes now the Appellant, Ronald J Ferguson, and hereby requests an extension in filing the Designation of Matters to be Included in the Record and Initial Brief in the matter at bar pending disposition of Ronald E. Ferguson and Susan M. Ferguson's Motion to Vacate in this matter.

Appellant has been informed that Respondent's counsel contacted the court via letter dated November 15, 2018 they have failed to receive notices from Appellant(s) regarding the transcript though specify no specific material.

A review of the material in question showed that two (2) letters were hand delivered to the offices of Chace Campbell regarding trial transcripts. It was additionally noted that on July 16, 2018 the same counsel filed a Motion to Dismiss. There was correspondence sent to the Clerk stating that

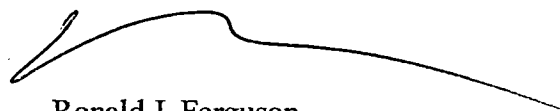
service had been denied and second service was attempted on August 6. The Court ruled on the Motion August 9, 2018.

Appellant has been informed that the Motion to Dismiss was filed in contravention of Rule 240, SCACR, and Rule 5, SCRPC. More specifically, a postal employee has stated that the first motion was returned for insufficient postage and is willing to testify to such. Accordingly, Ronald E. Ferguson and Susan M. Ferguson have indicated they were filing a Motion to Vacate the Order of August 9, 2018 based on the motion being improperly before the court and further asked that the briefing be delayed pending resolution of the matter to be considered for appellate purposes.

Whereas the trial transcript contains an explicit admission of Respondent's counsel introducing testimony of criminal conduct by both the Plaintiff and witness, and that conduct is under investigation Appellant(s) submit the record should be fully developed on this issue.

Therefore, Appellant Ronald J. Ferguson respectfully requests the filing of initial brief and Designation of Matters be delayed pending resolution of Ronald E. Ferguson and Susan M. Ferguson's Motion.

Respectfully submitted,



Ronald J. Ferguson
103 Mill Creek Rd
Piedmont, SC 29673
(864) 509-0169
Appellant pro-se

November 24, 2018

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GREENVILLE COUNTY
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Charles B. Simmons, Jr, Master-in-Equity

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v.

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PROOF OF SERVICE

I certify, that on this date, I served a copy of the Motion for Extension, dated 11/24/2018 on Respondent's Attorney of record by mailing it to the address indicted by their counsel of record as follows:

Chace Campbell
12 East Stone Street
Greenville, SC 29609

This the 24th day of November, 2018.



Ronald J. Ferguson

Ronald J. Ferguson
103 Mill Creek Road
Piedmont, SC 29673

November 24, 2018

Hon. Jenny Abbott Kitchings
Clerk of Court
PO Box 11629
Columbia, SC 29211

Re: Stehney v. Ferguson, et al
Appellate No. 2018-001279

Dear Ms. Kitchings:

Please find enclosed an original and six copies of an Motion for Extension in the above referenced matter along with a check in the amount of fifty-dollars (\$50.00) for the filing fee. If there should be any questions or concerns please do not hesitate to contact me.

Respectfully,


Ronald J. Ferguson

cc: Chace Damon Campbell

Ronald J. Ferguson
103 Mill Creek Road
Piedmont, SC 29673

November 24, 2018

Hon. Jenny Abbott Kitchings
Clerk of Court
PO Box 11629
Columbia, SC 29211

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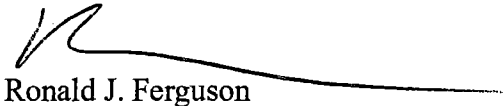
SC Court of Appeals

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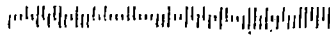
Respectfully,


Ronald J. Ferguson

cc: Chace Damon Campbell

✓

Ferguson



103 Mill Creek Rd
Piedmont SC 29673



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