

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

Appeal No. 2018-001279

Case No. 2013-CP-23-01715

RECEIVED
DEC 06 2018
SC Court of Appeals

Michael Stehney, Jr..... Respondent,

v.

Ronald E. Ferguson, Susan M. Ferguson,
and Ronald J. Ferguson
Of Whom Ronald J. Ferguson is Appellant.

RETURN TO MOTION

Respondent Michael Stehney, Jr., through his undersigned attorney, hereby respectfully moves to dismiss Appellant’s Motion filed November 29, 2018. The grounds for this motion are as follows:

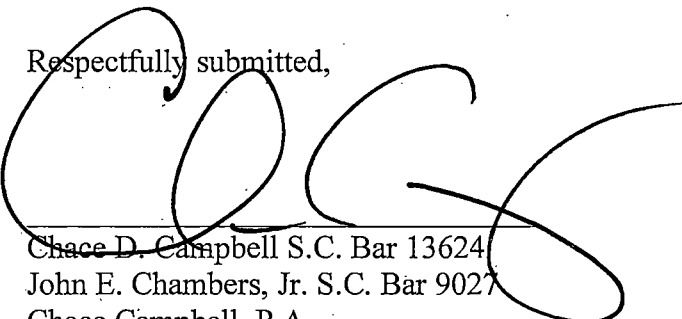
1. Appellant is once again using a filing in order to delay the case by asking for extension of time for filing his Initial Brief, which is due today, December 4, 2018.
2. This has been Appellant’s modus operandus since the beginning of the case in the lower court in 2013.
3. In this instance, Appellant’s delay is predicated on a Motion to Vacate regarding an August 9, 2018 Order. This Motion to Vacate is to be filed by Ronald E.

- Ferguson and Susan M. Ferguson at some time in the future, but which the Appellant nevertheless proceeds to argue for in his Motion.¹
4. The August 9, 2018 Order dismissing Ronald E. Ferguson and Susan M. Ferguson from this Appeal, was based on the fact that Ronald E. Ferguson and Susan M. Ferguson did not serve a notice of appeal. Ronald J. Ferguson tried filing an appeal on their behalves – again attempting to practice law without a license.
 5. As of December 5, 2018, the Appellant would be late in filing and serving his Initial Brief in this matter..

THEREFORE, the Respondent requests that the Court:

1. Dismiss the Appellant's Motion filed on November 29, 2018;
2. Dismiss the Appellant's appeal case due to his late filing of his Initial Brief; and thereby
3. Grant the Respondent permission to pursue the execution of judgments already granted to him in the Final Oder of the Common Pleas matter in order that Respondent may be made whole.

Respectfully submitted,



Chace D. Campbell S.C. Bar 13624
John E. Chambers, Jr. S.C. Bar 9027
Chace Campbell, P.A.
12 East Stone Avenue
Greenville, SC 29609
(864) 268-8244
Attorney for Respondent Michael Stehney,
Jr.

December 4, 2018

¹ Appellant was previously admonished by trial judges not to practice law without a license, but once again he is arguing a Motion not yet filed on behalf of his parents.

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and Ronald J. Ferguson Appellant.

CERTIFICATE OF SERVICE

This is to certify that I have served a true copy of the foregoing **Return to Appellant's Motion filed November 29, 2018** in the foregoing case on the following persons this 4th day of December, 2018, by depositing a copy of the same with the United States Postal Service, postage prepaid to the following:

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

CHACE CAMPBELL, P.A.



Lauren A. Rentz
Paralegal

December 4, 2018

**Chace Campbell, P.A.**
Attorneys At Law

December 4, 2018

VIA FIRST CLASS MAIL

Jenny Abbott Kitchings
Clerk of Court
Court of Appeals
P.O. Box 11629
Columbia, SC 29211

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RE: Michael Stehney, Jr., Respondent v. Ronald E. Ferguson et al
Appeal No.: 2018-001279

Dear Clerk Kitchings:

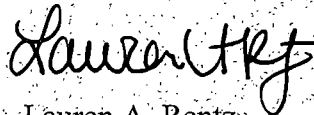
Please find enclosed a Return to Motion and Certificate of Service along with 7 copies.

Please file the original and copies accordingly and return a court clocked copy to us in the envelope provided.

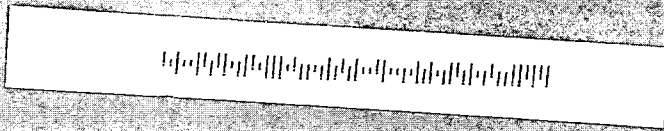
If you have any questions, please do not hesitate to call our office.

Sincerely,

CHACE CAMPBELL, P.A.



Lauren A. Rentz
Paralegal



Chace Campbell, P. A.
12 East Stone Avenue
Greenville, SC 29609

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