

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

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DEC 20 2018

SC Court of Appeals

Appeal No. 2018-001279

Case No. 2013-CP-23-01715

Michael Stehney, Jr. Respondent,

v.

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

Of Whom Ronald J. Ferguson is Appellant.

**RESPONDENT'S REPLY TO APPELLANT'S REPLY OT RESPONDENT'S
RETURN TO APPELLANT'S 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. The August 9, 2018 Order dismissing Ronald E. Ferguson and Susan M. Ferguson from this Appeal, was based on the fact of law that Ronald E. Ferguson and Susan M. Ferguson did not serve a notice of appeal in a timely fashion.¹

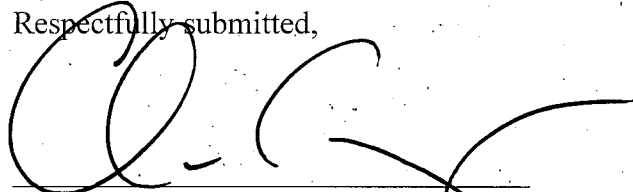
¹ Under any theory, the Notice of Appeal in this case was due by July 8, 2018, but to date, Ronald E. Ferguson and Susan M. Ferguson are yet to file a Notice of Appeal or any motion to reinstate their appeal. Therefore, not only are Ronald E. Ferguson and Susan M. Ferguson barred under the Appellate Court Rules, but also under the Doctrine of Latches.

2. Appellant was previously admonished by trial judges in various Court not to practice law without a license, but once again in his most recent filing dated December 13, 2018, he is acting as an advocate and arguing points of law on behalf of his parents, Ronald E. Ferguson and Susan M. Ferguson.
3. As of December 5, 2018, the Appellant was 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 against the Appellant in the Final Oder of the Common Pleas matter (Case No. 2013-CP-23-01715) so 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 18, 2018

THE STATE OF SOUTH CAROLINA
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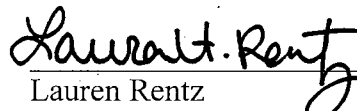
Ronald E. Ferguson, Susan M. Ferguson,
and Ronald J. Ferguson Appellant.

CERTIFICATE OF SERVICE

This is to certify that I have served a true copy of the foregoing **Respondent's Reply to Appellant's Reply to Respondent's Return to Appellant's Motion filed November 29, 2018** in the foregoing case on the following persons this 18th 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 Rentz
Paralegal

December 18, 2018

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

December 18, 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:

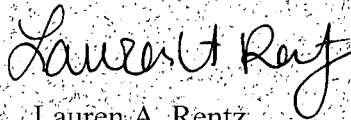
Please find enclosed a Reply to Respondent's Return to Appellant's Motion and Certificate of Service along with 7 copies.

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

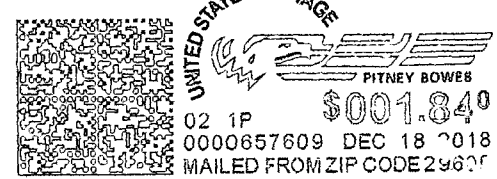
If you have any questions, please do not hesitate to call our office.

Sincerely,

CHACE CAMPBELL, P.A.



Lauren A. Rentz
Paralegal



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

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