

1 CURTIS SHEPHERD
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RECEIVED

MAR 25 2019

SC Court of Appeals

6 THE STATES OF SOUTH CAROLINA

7 IN THE COURT OF APPEALS

8 **WELLS FARGO BANK, NA**
9 Plaintiff,
10 vs.
11 **CURTIS SHEPHERD**

12 Defendant

Case No.: 14-CP-38-0094

APPEAL

13 APPLICATION FOR
14 *EX PARTE* ORDER STAYING
15 EXECUTION AND FOR ORDER
16 SHORTENING TIME FOR THE
17 SERVICE OF MOTION FOR STAY
18 OF EXECUTION POINTS AND
19 AUTHORITIES; DECLARATION OF
20 DEFENDANT -

**[PROPOSED] ORDER LODGED
HEREWITH**

21 [No Hearing Required Pursuant to Local
22 Rule Section 22-3-10 Unless Court So
23 Orders]
24 Date (TO BE SET)
25 Time

26 **MOTION TO STAY AND DISMISS BASED ON FRAUD ON THE COURT**

27 **NOTICE AND MOTION**

Case No. 14-CP-38-0094

28 CURTIS SHEPHERD NOTICE OF
APPEAL Date:, March 20, 2019

MOTION TO STAY AND DISMISS BASED ON FRAUD ON THE COURT

1
2 COMES NOW, Defendant CURTIS SHEPHERD, proceeding *in propria persona*,
3 and files Defendant *First Amended Verified Complaint*.

4 Defendant requests that his *Pro se* status is recognized and treated by the
5 Court as The United States Supreme Court and US District Courts have held such
6 status be recognized and treated. “A pro se litigant's pleadings are to be construed
7 liberally and held to a less stringent standard than formal pleadings drafted by
8 lawyers”. Haines v. Kerner, 404 U.S. 519, 520-21, 92 S.Ct. 594, 30 L.Ed.2d 652
9 (1972); see also Estelle v. Gamble, 429 U.S. 97, 106, 97 S.Ct. 285, 292, 50
10 L.Ed.2d 251 (1976); Gillihan v. Shillinger, 872 F.2d 935, 938 (10th Cir.1989).
11
12 “We hold pro se pleadings to a less stringent standard than pleadings drafted by
13 attorneys and construe them liberally”. Tannenbaum v. United States, 148 F.3d
14 1262, 1263 (11th Cir. 1998) (per curiam)
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23 Respectfully submitted,

24 Date: March 19, 2019

25 CURTIS SHEPHERD
26 Plaintiff, – Appellant
27 pro se litigants

28 **MOTION TO STAY AND DISMISS BASED ON FRAUD ON THE COURT**