

RECEIVED

JUL 29 2019

SC Court of Appeals

IN THE COURT OF APPEALS FOR
THE REPUBLIC STATE OF SOUTH CAROLINA

<p>Wilmington Savings Fund Society FSB as Trustee,</p> <p style="text-align: center;">Respondent(s),</p> <p style="text-align: center;">v.</p> <p>Nelson L. Bruce, Sui Juris, et al.,</p> <p style="text-align: center;">Appellant(s).</p>	<p>Case No. 2019-001208</p> <p>MOTION TO STAY PROCEEDINGS, HEARINGS IN COMMON PLEAS COURT SUB Contract Case No. 16-CP-18-1678 PENDING APPEAL</p>
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Comes now Appellant, Nelson L. Bruce, the natural man, of the age of the majority, with all natural rights explicitly reserved and retained and exercised at all times, hereby presents this motion to the court of appeals for the automatic stay and to stay the current proceedings which are the scheduled hearings scheduled for **July 30, 2019 at 10:30 a.m.** in the circuit court, court of common pleas pursuant to Rule **241(a), SCACR** as required by the general rules when a “**Notice of Appeal**” is filed in the court which are affected by the appeal (*See...C-SCULPTURES, LLC, NO. 3 v. Brown, 709 S.E.2d 705 (S.C. Ct. App. 2011)*).

See **APP - Exhibit A** (a copy of the notice of hearings to which a stay is being requested), which are the current proceedings scheduled in the court of common pleas for Dorchester county South Carolina, the lower court which are currently still pending in the court. This automatic stay is needed and required as the matters appealed greatly affects the current proceedings pending before the lower court as reference in the order which references the statement in the form of a letter by the Judge of record, **Diane S. Goodstein’s** directing the clerk of court, for the court to enter the judgment/order placed on the record on

July 16, 2019 which a copy of this judgment/order and letter has already been filed in this court on **July 22, 2019** with Appellants “**Notice of Appeal**” for which he received from the court of common pleas on **July 18, 2019**.

CONCLUSION

For the reasons specified above, this court should recognize and grant the automatic stay pending the appeal by the Appellant filed on **July 22, 2019**.

RESPECTFULLY PRESENTED,

“Without Prejudice”

Nelson L. Bruce 7-25-2019
Void/non- assumpsit
THE BENEFICIAL OWNER OF THE CESTI QUI EQUITABLE TRUST
Nelson L. Bruce, Propria Persona, Sui Juris
All Natural Rights Explicitly Reserved and Retained
U.C.C. 1-207/1-308, 1.103.6
c/o PMB 1605 Central Avenue, Ste.6 #167
Summerville South Carolina 29483, Ph. 843-437-7901

APP-Exhibits

Detailed Schedule of Exhibits - A:

1. **COPY OF HEARING SCHEDULED JULY 30, 2019 AT 10:30 A.M. APP – EXHIBITS A** (5 pages); and

6 pages total including this cover sheet

July 15, 2019



Motion "MDISMS - Motion/Dismiss and Order of Reference" for Case: 2016CP1801678 - Wilmington Savings Fund Society FSB as Trustee of Stanwich M , plaintiff, et al VS Nelson L Bruce , defendant, et al has been added to the following Motions Roster:

484 - 7/30/2019 Motion Roster - Hon. Maite' Murphy

This hearing of this motion has been scheduled for 7/30/2019 at 10:30 AM.

Reminder - NOTICE OF MOTION ROSTER: July 30, 2019 - Hon. Maite' Murphy Presiding. 5200 E. Jim Bilton Blvd., Courtroom TBD, St. George, SC 29477. Motion Hearings can be continued by the Clerk with written consent from all parties. Please contact Melissa Bates if your motion has been resolved. She can be reached at mbates@dorchestercountysc.gov. s/Diane S. Goodstein, Chief Administrative Judge, by Becky Stevens, Chief Deputy Clerk of Court (bstevens@dorchestercountysc.gov).

Mail Notice To:

Nelson L Bruce
1605 Central Avenue, Ste 6 #167
Summerville, SC 29483

Court Info:

Common Pleas
5200 E. Jim Bilton Blvd.
St. George, SC 29477-9477

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(843)563-0108

Respectfully,

Cheryl Graham
Clerk of Court

Cheryl Graham
CLERK OF COURT
DORCHESTER COUNTY

2019 JUL 15 AM 10:05

CERTIFIED COPY

July 15, 2019



Motion "MOFREE - Amended Motion/Pre Trial Discovery" for Case: 2016CP1801678 - Wilmington Savings Fund Society FSB as Trustee of Stanwich M , plaintiff, et al VS Nelson L Bruce , defendant, et al has been added to the following Motions Roster:

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Clerk of Court

Cheryl Graham
CLERK OF COURT
DORCHESTER COUNTY

2019 JUL 15 AM 10:05

CERTIFIED COPY

NOTICE OF MOTION SCHEDULING

July 15, 2019



Motion "MDISMS - Motion/Dismiss (FILING FEE CONTESTED)" for Case: 2016CP1801678 - Wilmington Savings Fund Society FSB as Trustee of Stanwich M , plaintiff, et al VS Nelson L Bruce , defendant, et al has been added to the following Motions Roster:

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Court Info:
Common Pleas 5200 E. Jim Bilton Blvd. St. George, SC 29477-9477

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(843)563-0108

Respectfully,

Cheryl Graham
Clerk of Court

Cheryl Graham
CLERK OF COURT
DORCHESTER COUNTY

2019 JUL 15 AM 10:05

CERTIFIED COPY

NOTICE OF MOTION SCHEDULING

July 15, 2019



Motion "MVACAT - Motion/Vacate 3/23/18 Order (FILING FEE CONTESTED)" for Case: 2016CP1801678 - Wilmington Savings Fund Society FSB as Trustee of Stanwich M , plaintiff, et al VS Nelson L Bruce , defendant, et al has been added to the following Motions Roster:

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Mail Notice To:

Nelson L Bruce
1605 Central Avenue, Ste 6 #167

Summerville, SC 29483

Court Info:

Common Pleas
5200 E. Jim Bilton Blvd.

St. George, SC 29477-9477

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(843)563-0108

Respectfully,

Cheryl Graham
Clerk of Court

Cheryl Graham
CLERK OF COURT
DORCHESTER COUNTY

2019 JUL 15 AM 10:06

CERTIFIED COPY

July 15, 2019



Motion "MDISMS - Motion/Dismiss 9/25/17 Order (FILING FEE CONTESTED)" for Case: 2016CP1801678 - Wilmington Savings Fund Society FSB as Trustee of Stanwich M , plaintiff, et al VS Nelson L Bruce , defendant, et al has been added to the following Motions Roster:

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Mail Notice To:
Nelson L Bruce 1605 Central Avenue, Ste 6 #167 Summerville, SC 29483

Court Info:
Common Pleas 5200 E. Jim Bilton Blvd. St. George, SC 29477-9477

If you have any questions regarding the scheduling of this motion, please contact the courts at:

(843)563-0108

Respectfully,

Cheryl Graham
Clerk of Court

Cheryl Graham
CLERK OF COURT
DORCHESTER COUNTY

2019 JUL 15 AM 10:06

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July 15, 2019



Motion "MVACAT - Motion/Vacate 9/15/17 Order (FILING FEE CONTESTED)" for Case: 2016CP1801678 - Wilmington Savings Fund Society FSB as Trustee of Stanwich M , plaintiff, et al VS Nelson L Bruce , defendant, et al has been added to the following Motions Roster:

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1605 Central Avenue, Ste 6 #167
Summerville, SC 29483

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Clerk of Court

Cheryl Graham
CLERK OF COURT
DORCHESTER COUNTY

2019 JUL 15 AM 10:06

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July 15, 2019



Motion "MOFREE - Motion/TRO (FILING FEE CONTESTED)" for Case: 2016CP1801678 - Wilmington Savings Fund Society FSB as Trustee of Stanwich M , plaintiff, et al VS Nelson L Bruce , defendant, et al has been added to the following Motions Roster:

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Mail Notice To:
<p>Nelson L Bruce 1605 Central Avenue, Ste 6 #167 Summerville, SC 29483</p>

Court Info:
<p>Common Pleas 5200 E. Jim Bilton Blvd. St. George, SC 29477-9477</p>

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(843)563-0108

Respectfully,

Cheryl Graham
Clerk of Court

Cheryl Graham
CLERK OF COURT
DORCHESTER COUNTY

2019 JUL 15 AM 10:06

CERTIFIED COPY

STATE OF SOUTH CAROLINA

COUNTY OF DORCHESTER

Wilmington Savings Fund Society, FSB, as
Trustee of Stanwich Mortgage Loan Trust C,

Plaintiff,

v.

Nelson L. Bruce; Capital Return Investments
LLC; Charleston Area CDC; SC Housing
Corp.; South Carolina Housing Trust Fund;
Reminisce Homeowners Association, Inc.,

Defendant(s).

17-004206

IN THE COURT OF COMMON PLEAS

C/A NO.: 2016-CP-18-01678

NOTICE OF MOTION HEARINGS

YOU WILL PLEASE TAKE NOTICE THAT, The Honorable Maite' Murphy has appointed July 30, 2019 at 10:30AM at the Dorchester County Courthouse at 5200 East Jirn Bilton Blvd., Saint George SC, 29477, as the time and place for holding hearings in foreclosure on the following Motions: Amended Motion/Pre-Trial Discovery, Motion/Dismiss, Motion/Vacate March 23, 2018 Order, Motion/Dismiss September 25, 2017 Order, Motion/Vacate September 15, 2017 Order, Motion/TRO, Motion/Dismiss and Order of Reference issued in the above-entitled cause.

s/William S. Koehler
William S. Koehler, SC Bar No.: 74935
Albertelli Law
1201 Main St., Suite 1450
Columbia, SC 29201
Phone: (803) 828-0880
Fax: (803) 828-0881

Date: 7/19/2019
Columbia, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

IN THE COURT OF COMMON PLEAS
C/A NO.: 2016-CP-18-01678

Wilmington Savings Fund Society, FSB, as
Trustee of Stanwich Mortgage Loan Trust C,

CERTIFICATE OF SERVICE BY MAIL

Plaintiff,

v.

Nelson L. Bruce; Capital Return Investments
LLC; Charleston Area CDC; SC Housing
Corp.; South Carolina Housing Trust Fund;
Reminisce Homeowners Association, Inc.,

Defendant(s).

17-004206

The undersigned hereby certifies that he/she is an employee of Albertelli Law, and is a person of such age and discretion to be competent to serve papers.

That on 19 day of July 2019, he/she served copies of the Notice of Motion Hearings by placing said copy in a postage paid envelope addressed to each of the following persons at the address stated below, which is the last known address, and by depositing said envelope and contents in the U.S. Mail.

Pleadings:
Parties Served:

Notice of Motion Hearings

Tracey C. Easton, Esq.
Attorney for SC Housing Corp. and South Carolina Housing
Trust Fund
300-C Outlet Pointe Blvd.
Columbia, SC 29210

Nelson L. Bruce
PMB 1605 Central Avenue, Ste. 6 #167
Summerville, SC 29483


Charleston Area CDC
2146 Dorchester Rd.
North Charleston, SC 29405

Charleston Area CDC
456 King Street
Charleston, SC 29403

Capital Return Investments, LLC
Jonathan Corbin, Registered Agent
PMB 1605 Central Avenue, Ste. 6 #167
Summerville, SC 29483

Capital Return Investments, LLC
Jonathan Corbin, Registered Agent
1385 Longridge Road
Monks Corner, SC 29461

Reminisce Homeowners Association, Inc.
C/o John Poston, Registered Agent
304 Meeting St.
Charleston, SC 29401



Aubrey E. Fox
Paralegal
Albertelli Law

Columbia, South Carolina

Certificate of Electronic Notification

Recipients

William Koehler - Notification transmitted on 07-19-2019 03:06:56 PM.

Tracey Easton - Notification transmitted on 07-19-2019 03:06:56 PM.

***** IMPORTANT NOTICE - READ THIS INFORMATION *****
NOTICE OF ELECTRONIC FILING [NEF]

-

A filing has been submitted to the court RE: 2016CP1801678

Official File Stamp: 07-19-2019 03:06:47 PM

Court: CIRCUIT COURT

Common Pleas

Dorchester

Case Caption:

Wilmington Savings Fund Society FSB as Trustee
of Stanwich M , plaintiff, et al VS Nelson L Bruce ,
defendant, et al

Document(s) Submitted: Notice/Notice of Hearing and Service

Filed by or on behalf of: William S. Koehler

This notice was automatically generated by the Court's auto-notification system.

-

The following people were served electronically:

William S. Koehler for Wilmington Savings Fund
Society FSB as Trustee of Stanwich M

Tracey C. Easton for South Carolina Housing
Trust Fund, SC Housing Corp

**The following people have not been served electronically by the Court. Therefore, they must
be served by traditional means:**

Reminisce Homeowners Association Inc

Capital Return Investments LLC

Charleston Area CDC

Nelson L Bruce for Nelson L Bruce

Nelson L Bruce for Nelson L Bruce

~~_____~~ **CERTIFICATE OF SERVICE**

It is hereby certified, that on the date noted below, the undersigned ~~_____~~ mailed to:

ALBERTELI LAW
Attention: William S. Koehler
1201 Main Street, Suite 1450
Columbia, South Carolina 29201
(803) 828-0880
Priority Mail No. 9505 5105 4583 9207 4947

South Carolina Housing Trust Fund
SC Housing Corp
Attention: Tracey C. Easton
300-C Outlet Pointe Boulevard
Columbia, South Carolina 29210
(803) 896-8771 / (803) 896-9023
Priority Mail No. 9505 5105 4583 9207 4946 96

Dorchester County Courthouse
Attention: Cheryl Graham – Clerk of Court
5200 E. Jim Bilton Boulevard
Saint George, South Carolina 29477
(843) 832-0108
Priority Mail No. 9505 5105 4583 9207 4946 89

RECEIVED

JUL 29 2019

SC Court of Appeals

herein after, "Recipient," the documents pertaining to Wilmington Savings v. Nelson Bruce Case # 2019-001208 as follows:

1. Appellant Motion to Stay Proceedings and APP – EXHIBITS A (14 pages); and
2. Appellant Motion to PROCEED IN FORMA PAUPERIS/CONTEST FILING FEE (1 page); and
3. Reference copy of this Notary's Certificate of Service (signed original on file) 1 page.

by PRIORITY MAIL by placing same in a postpaid envelope properly addressed to Recipient at the said address above and depositing same at an official depository under the exclusive face and custody of the U.S. Postal Service within the State of South Carolina.

Total of 16 pages.

Nelson L. Bruce 7-26-2019
Nelson L. Bruce Date

Notary Public Signature:

Notary Public Print:

Date:

My Commission Expires:

~~(SEAL)~~

~~_____~~
~~_____~~
~~_____~~
~~_____~~



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29201

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POSTAGE PAID - TAXE PERCUE
IMM 742.1/742.2 UPU RL 114(2.2)
[Signature] Stamp/Seal
Foreign Office of Origin

FROM:

From: as man, Nelson : Bruce, Sui Juris
c/o PMB 1605 Central Avenue, Suite 6 # 167
Summerville, South Carolina Republic
Non-Domestic, Non-Assumpsit
without the United States Corp.*
[zip code exempt - DMM 602 1.3e (2)]

USPS Intl. MAIL MANUAL
<http://pe.usps.com/text/imm>
742.1 Marketing Postage Paid
742.2 Parcels w/o Stamps – treat as Pre Paid

TO:

COURT OF APPEALS
ATTENTION: CLERK OF COURT
1220 Senate Street
Columbia, South Carolina 29201

EXPECTED DELIVERY DAY: 07/29/19

USPS TRACKING NUMBER



9505 5105 4583 9207 4947 19