

91005

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE RICHLAND COUNTY
Court of Common Pleas

The Honorable Jocelyn Newman

Appellate Case No.: 2019-001438

RECEIVED

SEP 30 2019

SC Court of Appeals

Gary Washington,.....Petitioner,

v.

South Carolina Community Bank,.....Respondent.

MOTION TO STAY THE PROCEEDINGS

COMES NOW the Appellant, Gary Washington, by and through undersigned counsel, Amber Robinson and William G. Yarborough, III, and moves this Honorable Court to issue an order to stay the proceedings; or in the alternative, moves this Honorable Court to enter an order extending the time to file and serve Appellant's initial brief.

Counsel respectfully submits that granting a stay to hold the appeal and deadlines may be appropriate so that Appellant may have time to find substitute local Counsel in anticipation of local Counsel's withdrawal. Counsel's alternate request for an extension of time is likewise not made with the intent to cause further undue delay or prejudice to Respondent. Counsel believes

that either requested relief is warranted in the ends of justice, to provide Appellant with a full and fair opportunity to seek appellate relief, as well as safeguard his right to direct appeal.

Respectfully submitted,



Amber Robinson, Esquire
Attorney for Applicant



William G. Yarborough (Sep 27, 2019)

William G. Yarborough, III
Attorney for the Applicant
308 W. Stone Ave.
Greenville, SC 29609
(864) 331-1612

Greenville, SC
September 24, 2019

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE RICHLAND COUNTY
Court of Common Pleas

The Honorable Jocelyn Newman

Appellate Case No.: 2019-001438

RECEIVED

SFP 3 0 2019

SC Court of Appeals

Gary Washington,.....Petitioner,

v.

South Carolina Community Bank,.....Respondent.

CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that she is employed in the Law Office of William G. Yarborough, III, 308 W. Stone Avenue, Greenville, South Carolina, and is a person of such age and discretion as to be competent to serve papers.

That on the 27th day of August 2019, she served a copy of each of the attached **MOTION TO STAY THE PROCEEDINGS** and **MOTION TO WITHDRAW AS COUNSEL**, by placing said copies in a postpaid envelope, addressed to the person hereinafter named, at the place and address stated below, by depositing said envelope and contents in the United States Mail at Greenville, South Carolina.



Elizabeth Crowther

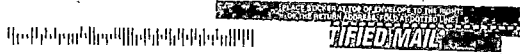
Legal Assistant to William G. Yarborough, III

**The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211**

Cc:

**Amber Robinson, Esq.
Charles Webb, Esq.
Carmen V. Ganjehsani**

William Ya
308 W. St.
Greenville, SC 29609



7018 3090 0002 3171 0220



U.S. POSTAGE PAID
FC PAID AT
GREENVILLE, SC
29602
SEP 27 '19
AMOUNT
\$10.69
R2305M147171-50

RETURN RECEIPT
REQUESTED

Clerk of Court - SC Court of Appeals
Attn: The Honorable Jenny Abbott Kitchings
1220 Senate St.
Columbia, SC 29201

RECEIVED

SEP 30 2019
SC Court of Appeals