

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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JUN 08 2020

APPEAL FROM Horry COUNTY
Court of Common Pleas

SC Court of Appeals

Cynthia Graham Howe, Master-In-Equity

Appellate Case No. 2018-001590

Andrew Waldo; Jane Zheng; and SC Coast Properties, LLC d/b/a
Keller Williams Realty Respondents,

v.

Michael Cousins; Founders Five, LLC d/b/a Sperry Van Ness Founders
Group; and South Carolina Association of REALTORS® Appellants.

REQUEST FOR PROTECTION

I am scheduled to have lumbar spine surgery June 10. Assuming no complications and a normal recovery path according to my surgeon I will be:

- Discharged from hospital June 13
- Unable to perform work or likely effectively communicate June 10-21
- Unable to leave home but able to perform work and communicate June 22-28
- Return to work Monday, June 29, but will be in a back brace and unable to stand for extended periods of time or drive until July 24.

I am requesting protection from scheduling in the above matter June 10-29, 2020. If you can grant protection for these dates, I would be most grateful. To my knowledge, there are no hearings or deadlines scheduled for these dates.

By copy of this letter via electronic mail, as permitted by the Supreme Court's Coronavirus Order, I am informing counsel of record of the same. Counsel of record for the other parties consent to this request.



Marcus A. Manos, SC Bar #011876
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Post Office Drawer 2426
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Attorneys for Appellant South Carolina
Association of Realtors®

June 3, 2020.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

Appeal from Horry County
Court of Common Pleas

Cynthia Graham Howe, Master-In-Equity, Circuit Court Judge

Case No. 2018-001590

Andrew Waldo; Jane Zheng; and SC Coast Properties, LLC d/b/a
Keller Williams Realty..... Respondents,

v.

Michael Cousins; Founders Five, LLC d/b/a Sperry Van Ness Founders Group;
and South Carolina Association of REALTORS@..... Appellants.

PROOF OF SERVICE

The undersigned hereby certifies that a copy of the **REQUEST FOR PROTECTIOIN** has been served upon counsel of record via electronic mail on the _____ day of June 2020, to the addresses shown below.

Douglas M. Zayicek, Esquire
THE BELLAMY LAW FIRM
1000 29th Avenue North
Myrtle Beach, South Carolina 29578
DZayicek@bellamylaw.com

L. Sidney Connor, IV, Esquire
KELAHER, CONNELL & CONNOR, P.C.
The Courtyard, Suite 209
1500 U.S. Highway 17 North
Surfside Beach, South Carolina 29587
sconnor@classactlaw.net

NEXSEN PRUET, LLC

Columbia, South Carolina

June 4, 2020

VIA U.S. MAIL

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

RECEIVED
Admitted in SC, NC, DC

JUN 08 2020

SC Court of Appeals

RE: Andrew Waldo, Jane Zheng and SC Coast Properties, LLC d/b/a Keller Williams Realty vs. Michael Cousins, Founders Five, LLC d/b/a Sperry Van Ness Founders Group, and South Carolina Association of REALTORS® / Case No. 2018-001590

Dear Ms. Kitchings:

Enclosed for filing are an original and one (1) copy of a **Request For Protection** from counsel for **Appellant South Carolina Association of REALTORS® and Proof of Service** in the above-referenced matter. Please return a file-stamped copy to me in the postage paid envelope provided.

By copy of this letter and as evidence by the attached Proof of Service, we are serving counsel of record with a copy of the Request For Protection. I consulted with counsel of record prior to filing and both Mr. Connor and Mr. Zayicek consent to this request.

Thank you for your assistance in this matter.

With best regards, I am

Very truly yours,



Marcus A. Manos

MAM/hjr

Enclosure

cc w/encl.: Douglas M. Zayicek, Esquire – Dzayicek@bellamylaw.com
L. Sidney Connor, IV, Esquire – sconnor@classactlaw.net

- Charleston
- Charlotte
- Columbia**
- Greensboro
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- Raleigh

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The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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SC Court of Appeals

(MAM) 34544-19

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