

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

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**Nov 12 2021**

APPEAL FROM RICHLAND COUNTY  
In the Court of Common Pleas  
Robert E. Hood, Circuit Court Judge

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**SC Court of Appeals**

Appellate Case No. 2021-000794  
Case No. 2019-CP-40-05675

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Richard A. Harpootlian, Respondent,

v.

South Carolina Department of Commerce; Secretary Robert Hitt in his official capacity;  
Coordinating Council for Economic Development; and Director Daniel Young in his  
official capacity, Defendants,

of which South Carolina Department of Commerce and Coordinating Council for  
Economic Development are the Appellants.

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**JOINT MOTION FOR STAY**

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Pursuant to Rules 240 and 263, SCACR, Appellants South Carolina Department of Commerce and Coordinating Council for Economic Development and Respondent Richard A. Harpootlian respectfully request a stay of all proceedings and deadlines in this matter for a period of 60 days. The parties request this stay because they have entered into good faith settlement negotiations that may resolve the parties' dispute and obviate the need for the Court to issue a decision. Upon finalization of any settlement agreement, or if a final settlement is not reached within the period of the requested stay, the parties will inform the Court so that this matter may be dismissed or resumed. The parties submit that good cause supports the requested relief and that the requested stay will preserve the Court's and the parties' time and resources. *See Landis v. North*

*Am. Co.*, 299 U.S. 248, 254 (1936) (“[T]he power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants.”).

For these reasons, the parties respectfully request that the Court stay this matter for 60 days. It is further respectfully requested that the current filing deadline of November 15, 2021, for Appellants’ initial brief and designation of matter be held in abeyance while this joint motion for stay is considered.

Respectfully submitted,

s/Christopher P. Kenney  
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November 12, 2021

Respectfully submitted,

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