

# WILLOUGHBY & HOEFER, P.A.

ATTORNEYS & COUNSELORS AT LAW

MITCHELL M. WILLOUGHBY  
JOHN M.S. HOEFER  
RANDOLPH R. LOWELL\*\*  
TRACEY C. GREEN  
CHAD N. JOHNSTON  
JOHN W. ROBERTS  
ELIZABETH ZECK\*  
ELIZABETHANN L. CARROLL  
R. WALKER HUMPHREY, II\*\*\*  
ANDREW R. HAND\*\*\*\*  
J. JOSEPH OWENS

ELIZABETH S. MABRY  
J. PATRICK HUDSON  
OF COUNSEL

JOSEPH H. FARRELL, III  
SPECIAL COUNSEL

November 12, 2021

\*ALSO ADMITTED IN TEXAS  
\*\*ALSO ADMITTED IN WASHINGTON, D.C.  
\*\*\*ALSO ADMITTED IN CALIFORNIA  
\*\*\*\*ALSO ADMITTED IN NORTH CAROLINA

## VIA ELECTRONIC FILING BY EMAIL

The Honorable Jenny Abbott Kitchings  
Clerk of Court  
South Carolina Court of Appeals  
1220 Senate Street  
Columbia, South Carolina 29201  
ctappfilings@sccourts.org

RECEIVED

Nov 12 2021

SC Court of Appeals

RE: *Richard A. Harpootlian v. South Carolina Department of Commerce and Coordinating Council for Economic Development;*  
Appellate Case No.: 2021-000794

Dear Ms. Kitchings:

Attached for electronic filing by email in accordance with Supreme Court Order 2020-1-08-25-02, part (b)(2), and pursuant to Rule 240 of the South Carolina Appellate Court Rules, please find the **Joint Motion for Stay** of Appellants South Carolina Department of Commerce and Coordinating Council for Economic Development and Respondent Richard A. Harpootlian.

By copy of this letter, we are serving counsel for the parties via email as permitted by Order 2021-08-25-02, part (d)(1), and attached is a proof of service to that effect. Pursuant to Rule 203(d)(1)(B)(iii), no filing fee is required because Appellants are entities of the State of South Carolina.

If you have any questions or need additional information, please do not hesitate to contact me.

Very truly yours,

WILLOUGHBY & HOEFER, P.A.



John W. Roberts

JWR/epk

Attachments

cc: Richard A. Harpootlian, Esquire  
Christopher P. Kenney, Esquire

OFFICES:

COLUMBIA | 930 RICHLAND STREET, COLUMBIA, SC 29201 | 803.252.3300 FAX 803.256.8062  
CHARLESTON | 133 RIVER LANDING DRIVE, SUITE 200, CHARLESTON, SC 29492 | 843.619.4426 FAX 843.619.4490