

RECEIVED

May 18 2022

S.C. SUPREME COURT

THE STATE OF SOUTH CAROLINA  
IN THE SUPREME COURT

---

Donald Stanley and Sean Reiter, Individually and as Class Representatives, Respondents,

v.

Southern States Police Benevolent Association, Inc., Petitioner.

Appellate Case No. 2022-000367

---

**Consent Motion to Hold Appeal in Abeyance  
and Remand For Settlement Hearing**

---

NOW COMES the Respondents, by and through their attorneys of record, with the consent of the Petitioners, and hereby move that this Appeal be held in abeyance and remanded for the purpose of seeking court approval of a proposed class action settlement. The parties have agreed to settlement terms in principle. As a class action suit, no settlement can be achieved without court approval. While the parties are confident that the court will look favorably upon the settlement, the parties nonetheless request that this appeal be held in abeyance in the event that the settlement is not approved. In order to restore jurisdiction to the Circuit Court for the purpose of hearing a petition to approve settlement, the Respondents respectfully request an order of this Court remanding this matter to the lower court and holding this appeal in abeyance pending such motion.

WE SO MOVE

**BLAND RICHTER, LLP**

*s/Eric S. Bland*

Eric S. Bland, SC Bar #64132

PO Box 72

Columbia, SC 29202

(803) 256-9664

[ericbland@blandrichter.com](mailto:ericbland@blandrichter.com)

Ronald L. Richter, Jr., SC Bar #66377

Scott M. Mongillo, SC Bar #16574

Peoples Building, mezzanine Level  
Charleston, SC 29401  
(843) 573-9900  
[ronnie@blandrichter.com](mailto:ronnie@blandrichter.com)  
[scott@blandrichter.com](mailto:scott@blandrichter.com)

Carl E. Pierce, II, SC Bar #7946  
Daniel F. Lynch, IV, SC Bar #102767  
Pierce, Sloan, Wilson,  
Kennedy & Early, LLC  
PO Box 22437  
Charleston, SC 29413  
(843) 722-7733  
[carlpierce@piercesloan.com](mailto:carlpierce@piercesloan.com)  
[daniellynch@piercesloan.com](mailto:daniellynch@piercesloan.com)

Andrew J. Savage, III, SC Bar #4946  
Savage Law Firm  
15 Prioleau Street  
Charleston, SC 29401  
(843) 720-7470  
[andy@savlaw.com](mailto:andy@savlaw.com)

**Attorneys for Respondents Donald Stanley  
and Sean Reiter, Individually and as Class Representatives**

WE SO CONSENT

*s/ James Edward Bradley*  
James Edward Bradley, SC Bar #66130  
Moore Bradley Myers Law Firm, P.A.  
P.O. Box 5709  
West Columbia, SC 29171  
(803) 796-9160  
(803) 791-8410 (fax)  
[Ward@mbmlawsc.com](mailto:Ward@mbmlawsc.com)

*s/J. Andrew Yoho*  
J. Andrew Yoho, SC Bar #100803  
Boyle, Leonard & Anders  
P.O. Box 31578  
Charleston, SC 29417  
(854) 800-0804  
(239) 337-7674 (fax)  
[AYoho@insurance-counsel.com](mailto:AYoho@insurance-counsel.com)

*s/ Barry Goheen*

Barry Goheen, Esquire

*Pro hac vice*

Fisher Broyles, LLP

4279 Roswell Road, Suite 208 #351

Atlanta, GA 30342

(678) 592-9507

(404) 793-3093 (fax)

[Barry.Goheen@fisherbroyles.com](mailto:Barry.Goheen@fisherbroyles.com)

**Attorneys for Petitioner Southern States**

**Police Benevolent Association, Inc.**