

STATE OF SOUTH CAROLINA )

COUNTY OF CHARLESTON )

Roosevelt Simmons )

Plaintiff )

v. )

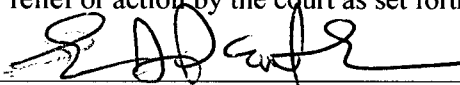
Mase And Company, Llc Et Al. )

Defendant. )

IN THE COURT OF COMMON PLEAS

CASE NO.  
2011-CP-10-1084

MOTION AND ORDER INFORMATION  
FORM AND COVER SHEET

<b>Plaintiff's Attorney:</b> Edward A. Bertele, Bar No. 72521 Address: 1812 Pierce Street Charleston, SC 29492 phone: 843-471-2082 fax: 843-471-2082 e-mail: ebertele@msn.com other:	<b>Defendant's Attorney:</b> , Bar No. Address:  phone:            fax: e-mail:           other:
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input checked="" type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
<b>SECTION I: Hearing Information</b>	
Nature of Motion: Estimated Time Needed:            Court Reporter Needed: <input type="checkbox"/> YES / <input type="checkbox"/> NO	
<b>SECTION II: Motion/Order Type</b>	
<input checked="" type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of Attorney for <input checked="" type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant	November 2, 2012 Date submitted
<b>SECTION III: Motion Fee</b>	
<input checked="" type="checkbox"/> PAID – AMOUNT: \$25. <input type="checkbox"/> EXEMPT: <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support (check reason) <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRPC) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: <input type="checkbox"/> Other:	
<b>JUDGE'S SECTION</b> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other:	_____ JUDGE CODE: _____ Date: _____
<b>CLERK'S VERIFICATION</b>	
Collected by: _____ Date Filed: _____	
<input type="checkbox"/> MOTION FEE COLLECTED: _____	

CONTESTED – AMOUNT DUE: \_\_\_\_\_

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS  
IN THE NINTH JUDICIAL CIRCUIT  
CASE NO. 2011CP10-1084

ROOSEVELT SIMMONS )  
Plaintiff )  
Vs. )  
MASE and COMPANY, LLC, )  
J. AL CANNON, JR., )  
CHARLESTON COUNTY )  
SHERIFF'S DEPARTMENT, )  
CHARLESTON COUNTY, )  
CHARLESTON COUNTY )  
REVENUE COLLECTIONS )  
DEPARTMENT and )  
HARRY LONG )  
Defendants )

FILED  
2012 NOV - 6 AM 10:31  
JULIE J. ARMSTRONG  
CLERK OF COURT

PLAINTIFF'S COUNSEL'S MOTION FOR  
ORDER OF PROTECTION

PLEASE TAKE NOTICE that Edward A. Bertele, Esq., attorney for plaintiff Roosevelt Simmons herewith moves before the Court of Common Pleas for the Ninth Judicial Circuit at the Charleston County Courthouse, 100 Broad Street, Charleston, SC 29401 for an Order of Protection for November 20, 2012 based upon the following circumstances. The within case is on the Jury Roster with a trial date "Not before November 15, 2012". This Court has already granted counsel for defendant Mase and Company, LLC, Wendy Keefer, Esq. an Order of Protection for the period November 15- 28, 2012. Moreover, plaintiff's counsel has recently been retained to represent an out of state litigant in a matter pending before the United States Bankruptcy Court for the District of South Carolina, Columbia Division , In re Gaythel Glenn Meadows, 2010-01930-JW. Counsel has filed a motion to seek relief from the automatic stay to enable certain discovery to be conducted in South Carolina. The motion is returnable on November 20<sup>th</sup> in Columbia and counsel is expected to attend. Accordingly, counsel requests protection from any court or other judicial proceedings for that date.

Counsel for the other parties has not indicated any objection.

Respectfully submitted,

Edward A. Bertele, Esq.  
1812 Pierce Street  
Charleston, SC 29492  
(843) 471-2082

Attorney for plaintiff Roosevelt Simmons

By: 

Dated: November 2, 2012  
Charleston, SC

#### CERTIFICATION OF SERVICE

I hereby certify that a true copy of the within motion for an Order of Protection was served upon the defendants' attorneys, Christopher Dorsel, Esq. and Wendy Keefer, Esq. by regular mail postage prepaid at their last known mailing address.

  
Edward A. Bertele, Esq.

November 2, 2012