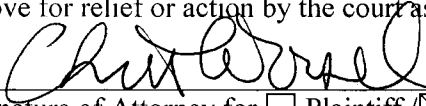


STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
ROOSEVELT SIMMONS)
 Plaintiff,)
 vs.)
)
 MASE AND COMPANY, LLC, J. AL)
 CANNON, JR., CHARLESTON COUNTY)
 SHERIFF'S OFFICE, CHARLESTON)
 COUNTY, CHARLESTON COUNTY)
 REVENUE COLLECTIONS)
DEPARTMENT, and HARRY LONG,)
 Defendant.)

IN THE COURT OF COMMON PLEAS
 NINTH JUDICIAL CIRCUIT
 2011
 CASE NO.: 2012-CP-10-1084

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET**

Plaintiff's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____	Defendant's Attorney: Christopher T. Dorsel, Bar No. 72504 Address: 3 Wesley Drive, Charleston, SC 29407 Phone: 843-556-4045 Fax 843-556-4046 E-mail: chris@sennlegal.com Other: _____
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input checked="" type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)	
SECTION I: Hearing Information	
Nature of Motion: _____ Estimated Time Needed: _____ Court Reporter Needed: <input type="checkbox"/> YES/ <input type="checkbox"/> NO	
SECTION II: Motion/Order Type	
<input type="checkbox"/> Written motion attached <input checked="" 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 type="checkbox"/> Plaintiff/ <input checked="" type="checkbox"/> Defendant	11/29/12 Date submitted
SECTION III: Motion Fee	
<input checked="" type="checkbox"/> PAID – AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason)	
<input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <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: _____	
JUDGE'S SECTION	
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____

CLERK'S VERIFICATION

Collected by: _____ Date Filed: _____

MOTION FEE COLLECTED: \$ _____

CONTESTED – AMOUNT DUE: \$ _____

SCCA 233 (11/2003)

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

ROOSEVELT SIMMONS,

Plaintiff,

v.

MASE AND COMPANY, LLC, J. AL
CANNON, JR., CHARLESTON COUNTY
SHERIFF'S OFFICE, CHARLESTON
COUNTY, CHARLESTON COUNTY
REVENUE COLLECTIONS
DEPARTMENT, and HARRY LONG,

Defendants,

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NO.: ~~2012~~-CP-10-1084

2011

BY _____

JULIE J. ARMSTRONG
CLERK OF COURT

2012 DEC 11 AM 10:28

FILED

CONSENT ORDER TO AMEND
SCHEDULING ORDER AND FOR A
CERTAIN TRIAL

This matter comes before this Honorable Court upon the joint request of the parties seeking to amend the scheduling order pursuant to S.C.R.C.P. 40, for the purpose of setting the above referenced matter for a date certain trial. The basis for this request is that six motions were heard on November 7, 2012, and the Court granted Plaintiff's Motion to Amend his pleadings to assert an additional cause of action. Therefore, additional time is needed for the filing of an amended Complaint, for responsive pleadings to be filed and for additional discovery on this new cause of action. Additionally, a date certain trial is requested as this case involves multiple governmental entities and over twenty witnesses.

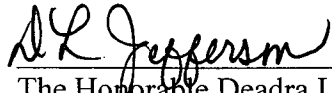
Therefore, with the consent of counsel for all parties, the undersigned adopts the following schedule set forth herein, and the following time limits hereby established in this case.

SCHEDULE

1/2/3
[Signature]

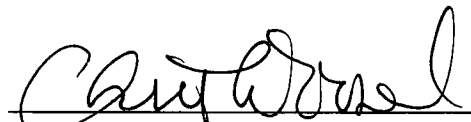
1. Discovery shall be complete by February 15, 2013.
2. The parties request a date certain trial after March 1, 2013.

AND IT IF SO ORDERED!



The Honorable Deadra L. Jefferson
Chief Administrative Judge

WE CONSENT:



CHRISTOPHER T. DORSEL

Senn Legal, LLC

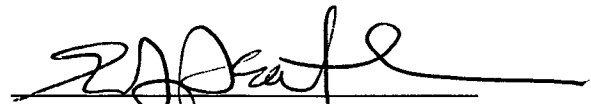
P.O. Box 12279

Charleston, SC 29422

(843) 556-4045

Attorneys for Defendants J. AL CANNON,
JR., CHARLESTON COUNTY SHERIFF'S
OFFICE, CHARLESTON COUNTY,
CHARLESTON COUNTY REVENUE
COLLECTIONS DEPARTMENT, and
HARRY LONG

WE CONSENT:



Edward A. Bertele, Esquire

1812 Pierce Street

Charleston, SC 29492

(843) 471-2082

Attorneys for Plaintiff

AKJ The case is set as a date certain
for the week beginning May 13, 2013.

WE CONSENT:

Wendy Keefe/with permission

Wendy J. Keefe, Esquire

Keefe & Keefe, LLC

1643B Savannah Hwy, Suite 226

Charleston, SC 29407

(843) 801-2414

Attorneys for Defendant Mase and Co.

343
J
JG



Senn Legal

—LLC—

ATTORNEYS AT LAW

*Sandra J. Senn
Robin L. Jackson
Christopher T. Dorsel
Caitlin E. Pierson*

*3 Wesley Drive
P.O. Box 12279
Charleston, SC 29422
(843) 556-4045
F:(843) 556-4046*

Chris@sennlegal.com

November 29, 2012

The Honorable Julie J. Armstrong
Clerk of Court, Charleston
100 Broad Street, Suite 106
Charleston, SC 29401

RE: Roosevelt Simmons v. Mase and Company, LLC, Et al
Case No.: 2011-CP-10-1084

Dear Ms. Armstrong:

Enclosed for filing please find the original and two (2) copies of the Consent Order to Amend Scheduling Order and for Date Certain Trial, along with a motion slip and filing fee in the above referenced matter. If you would, please have the administrative judge execute the order then clock-in the additional copies and return them to me in the enclosed self-addressed stamped envelope. By copy of this letter, opposing counsel is being served with a copy of this responsive pleading on today's date.

With kind regards, I am,

Sincerely,

Christopher T. Dorsel

CTD/mnz
Enclosures

cc: Edward A. Bertele, Esquire (*via email*)
Wendy Keefer, Esquire (*via email*)