

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  
Dept, and Harry Long,  
X Defendants. )

IN THE COURT OF COMMON PLEAS

2011  
CASE NO. 2012-CP-10- 1084

MOTION INFORMATION FORM  
AND COVER SHEET

Plaintiff's Attorney:	Defendant's Attorney: <b>Christopher T. Dorsel</b> , Bar No. <b>Senn Legal, LLC</b> Address: P.O. Box 12279 Charleston, SC 29422 phone: 843-556-4045 e-mail: other:
<b>MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)</b> <b>X FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)</b>	
<b>SECTION I: Hearing Information</b>	
Nature of Motion: <u>Motion for Summary Judgment</u> Estimated Time Needed: 15 mins Court Reporter Needed: YES	
<b>SECTION II: Motion Type</b>	
X Written motion attached Form Motion -- I hereby move for relief or action by the court as set forth in the attached proposed order.	
 Signature of Attorney for Defendant	<u>February 20, 2012</u> Date submitted
<b>SECTION III: Motion Fee</b>	
X PAID – AMOUNT: \$25.00 <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> Date Filed:	
Collected by: _____	
<input type="checkbox"/> MOTION FEE COLLECTED: _____ <input type="checkbox"/> CONTESTED – AMOUNT DUE: _____	

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

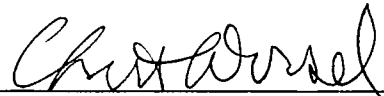
2011

MOTION FOR SUMMARY JUDGMENT

FILED  
2012 FEB 22 PM 3:10  
JULIE J. ARMSTRONG  
CLERK OF COURT  
BY \_\_\_\_\_

Comes now Defendants, J. AL CANNON, JR., CHARLESTON COUNTY SHERIFF'S OFFICE, CHARLESTON COUNTY, CHARLESTON COUNTY REVENUE COLLECTIONS DEPARTMENT, and HARRY LONG ("These Defendants"), pursuant to the South Carolina Rules of Civil Procedure, Rule 56 and notify you that on the 10<sup>th</sup> day or as soon thereafter as possible, These Defendants will move this Honorable Court for an Order granting summary judgment. This motion will be more fully supported by the record, affidavits and deposition transcripts which may be submitted and a memorandum to be submitted.

RESPECTFULLY MOVED,



CHRISTOPHER T. DORSEL

*Senn Legal, LLC*

P.O. Box 12279

Charleston, SC 29422

(843) 556-4045

Attorneys for Defendants

February 20, 2012

Charleston, South Carolina