

STATE OF SOUTH CAROLINA)

) IN THE COURT OF COMMON PLEAS

COUNTY OF CHARLESTON)

Roosevelt Simmons,
_ Plaintiff.)

CASE NO. ²⁰¹¹~~2012~~-CP-10-1084

v.)

MOTION INFORMATION FORM
AND COVER SHEET

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.)

Plaintiff's Attorney:	Defendant's Attorney: Christopher T. Dorsel , Bar No. Senn Legal, LLC Address: P.O. Box 12279 Charleston, SC 29422 phone: 843-556-4045 e-mail: other:
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MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
X FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion: Motion for Protection from Court
Estimated Time Needed: 30 mins Court Reporter Needed: YES

SECTION II: Motion Type

X Written motion attached
Form Motion --
I hereby move for relief or action by the court as set forth in the attached proposed order.

Chris Dorsel August 31, 2012
Signature of Attorney for Defendant Date submitted

SECTION III: Motion Fee

X PAID – AMOUNT: \$25.00
 EXEMPT: Rule to Show Cause in Child or Spousal Support
(check reason) Domestic Abuse or Abuse and Neglect
 Indigent Status State Agency v. Indigent Party
 Sexually Violent Predator Act Post-Conviction Relief
 Motion for Stay in Bankruptcy
 Motion for Publication Motion for Execution (Rule 69, SCRCP)
 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:
 Other:

JUDGE'S SECTION

Motion Fee to be paid upon filing of the attached order.
 Other:

JUDGE _____

CODE: _____ Date: _____

CLERK'S VERIFICATION Date Filed:

Collected by: _____

MOTION FEE COLLECTED: _____
 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 PROTECTION FROM
COURT**

BY 
JULIE J. ARMSTRONG
CLERK OF COURT
2012 SEP -4 PM 1:38

FILED

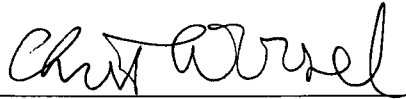
Counsel for Defendants J. AL CANNON, JR., CHARLESTON COUNTY SHERIFF'S OFFICE, CHARLESTON COUNTY, CHARLESTON COUNTY REVENUE COLLECTIONS DEPARTMENT, and HARRY LONG (hereafter "these Defendants") moves before this Honorable Court for an Order of Protection from Court appearances on behalf of Defendant Harry Long. Counsel for these Defendants submits to this Court that Defendant Long will be out of the country from September 15, 2012 until September 22, 2012 for a long planned, pre-paid vacation. Mr. Long is a named Defendant and therefore is a necessary witness and has advised that he wishes to be present in the courtroom for any potential verdict against him.

Counsel for these Defendants has consulted with Plaintiff's counsel and with counsel for co-Defendant Mase and Company, LLC, and both do not object to this Motion for Protection.

For the foregoing reasons, Counsel for these Defendants requests protection from Court appearances from September 15, 2012 until September 22, 2012.

(Signature on following page)

Respectfully Submitted,

A handwritten signature in cursive script, reading "Chris Dorsey", written in black ink. The signature is positioned above a horizontal line that extends to the right.

CHRISTOPHER T. DORSEL

Senn Legal, LLC

P.O. Box 12279

Charleston, SC 29422

843-556-4045

fax: 843-556-4046

Chris@Sennlegal.com

Attorney for Defendants

August 31, 2012

Charleston, South Carolina



Senn Legal
-LLC-
ATTORNEYS AT LAW

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Chris@sennlegal.com

August 31, 2012

The Honorable Julie J. Armstrong
Clerk of Court, Charleston
100 Broad Street, Suite 106
Charleston, SC 29402

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

Dear Julie:

Enclosed for filing, please find Defendants' Motion for Protection from Court along with the Motion Slip and required filing fee. If you would, please clock-in the original and additional copies and return the copies to me in the envelope provided for your convenience. Opposing counsel is being served via this correspondence.

With kind regards, I am,

Sincerely,

Christopher T. Dorsel

CTD/lem

Enclosure

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