

STATE OF SOUTH CAROLINA )  
 )  
 COUNTY OF CHARLESTON )  
 )  
 Katherine M. a minor by and through her next )  
 of friend Amy D. McCabe )  
 \_\_\_\_\_ )  
 Plaintiff, )  
 vs. )  
 )  
 Daniel G. Irons and Julia Tinsley, )  
 \_\_\_\_\_ )  
 Defendant. )

IN THE COURT OF COMMON PLEAS  
 NINTH JUDICIAL CIRCUIT  
 CASE NO.: 2016-CP-10-6385

**MOTION AND ORDER INFORMATION**  
**FORM AND COVERSHEET**

Plaintiff's Attorney: Gregory D. Keith, Esquire, Bar No. 7119 Address: Uricchio Howe Krell Jacobson Toporek & Keith P.O. Box 399, Charleston, SC 29402 Phone: (843)723-7491 Fax (843)577-4179 E-mail: greg@uricchio.com Other: _____	Defendant's Attorney: David S. Cobb, Esquire, Bar No. _____ Address: Turner Padgett Graham & Lane, PA P.O. Box 22129, Charleston, SC 29413 Phone: _____ Fax _____ E-mail: _____ Other: _____
--	--

**MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)**  
 **FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)**  
 **PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)**

**SECTION I: Hearing Information**  
 Nature of Motion: Status Conference  
 Estimated Time Needed: 30 minutes Court Reporter Needed:  YES /  NO

**SECTION II: Motion/Order Type**  
 Written motion attached  
 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  Plaintiff /  Defendant Date submitted 8/27/19

**SECTION III: Motion Fee**  
 PAID – AMOUNT: \$ \_\_\_\_\_  
 EXEMPT: (check reason)  Rule to Show Cause in Child or Spousal Support  
 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**  
 Collected by: \_\_\_\_\_ Date Filed: \_\_\_\_\_  
 MOTION FEE COLLECTED: \$ \_\_\_\_\_  
 CONTESTED – AMOUNT DUE: \$ \_\_\_\_\_

SCCA 233 (11/2003)

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )  
 )  
KATHERINE M. A MINOR BY AND )  
THROUGH HER NEXT OF FRIEND, )  
AMY D. MCCABE, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
DANIEL G. IRONS AND JULIA )  
TINSLEY, )  
 )  
Defendants. )  
 )  
\_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
NINTH JUDICIAL CIRCUIT  
C/A NO.: 2016-CP-10-6385

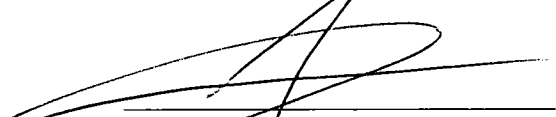
FILED  
2019 AUG 27 PM 3:06  
JULIE J. ABRAMS IRONS  
CLERK OF COURT  
P

**PLAINTIFF'S MOTION FOR  
STATUS CONFERENCE**

Plaintiff believes that issues have arisen in the above referenced matter, and intervention from the court is needed in order to move the case forward. Therefore, the Plaintiff requests that a status conference is scheduled.

For the above reasons the Plaintiff's request a status conference in this matter.

Respectfully submitted,



\_\_\_\_\_  
Gregory D. Keith  
Uricchio, Howe, Krell, Jacobson,  
Toporek, Theos & Keith, P.A.  
P.O. Box 399  
Charleston, SC 29402  
Phone: (843)723-7491  
Fax: (843)577-4179  
greg@uricchio.com  
**ATTORNEY FOR PLAINTIFF**

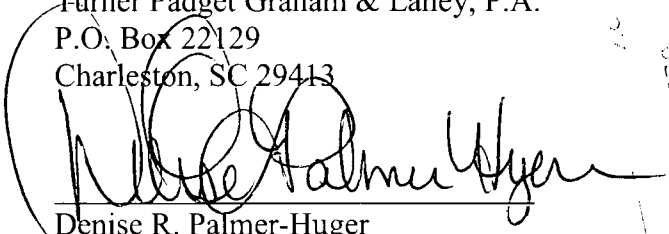
Charleston, South Carolina  
August 27, 2019

**CERTIFICATE OF SERVICE**

Katherine M. a minor by and through her next of friend, Amy D. McCabe vs.  
Daniel G. Irons, and Julia Tinsley  
Case No.: 2016-CP-10-6385

I, hereby certify that on August 27, 2019, I have served a copy of the foregoing Pleading in connection with the above referenced case by mailing a copy of the same by United States Mail, postage prepaid, to the following address:

David S. Cobb, Esquire  
Turner Padgett Graham & Laney, P.A.  
P.O. Box 22129  
Charleston, SC 29413



Denise R. Palmer-Huger  
Paralegal to Gregory D. Keith

FILED  
2019 AUG 27 PM 3:06  
JULE J. ARMSTRONG  
CLERK OF COURT

URICCHIO, HOWE, KRELL, JACOBSON, TOPOREK, THEOS & KEITH, P.A.

ATTORNEYS AT LAW  
17<sup>1/2</sup> BROAD STREET  
CHARLESTON, SC 29401

PAUL N. URICCHIO, JR. (1922-2000)  
ARTHUR G. HOWE (1927-2004)  
BARRY KRELL  
CARL H. JACOBSON  
ALAN D. TOPOREK  
JERRY N. THEOS  
GREGORY D. KEITH  
JONATHAN F. KRELL  
JEFF BUNCHER, JR.  
MARGARET THEOS GUERRY  
J. DEVEAUX STOCKTON

MAILING ADDRESS:  
P.O. BOX 399  
CHAS., SC 29402-0399

TELEPHONES:  
(843) 723-7491  
1-800-899-1683  
FAX (843) 577-4179

August 27, 2019

**VIA HAND DELIVERY**

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

RE: Katherine M. a minor by and through her next of friend, Amy D. McCabe vs.  
Daniel G. Irons, and Julia Tinsley  
Case No.: 2016-CP-10-6385

RE: Amy D. McCabe vs. Daniel G. Irons, and Julia Tinsley  
Case No.: 2016-CP-10-6386

Dear Ms. Armstrong:

Enclosed for filing, please find the Plaintiff's Motion for a Status Conference and Certificate of Service in regards to the above referenced matter. I have also enclosed two checks in the amount of \$25.00 for the filing fee.

I ask that you please schedule this matter for a hearing, and provide us with a date and time. In the meantime, if you have any questions, please do not hesitate to give me a call.

With kindest personal regards,

Sincerely,

URICCHIO, HOWE, KRELL, JACOBSON,  
TOPOREK & KEITH, P.A.

  
GREGORY D. KEITH

GDK/drp  
Enclosures

cc: David Cobb, Esquire (w/encl.)  
Amy McCabe (w/encl.)