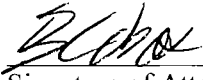


STATE OF SOUTH CAROLINA)
)
 COUNTY OF CHARLESTON)
)
 Kylie Erickson,)
)
 _____)
 Plaintiff,)
 vs.)
)
 James Ventures, LLC d/b/a Loggerheads Beach)
 Grill, and Jenna Mattox,)
 _____)
 Defendants.)

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT
 CASE NO.: 2018-CP-10-05822

**MOTION AND ORDER INFORMATION
 FORM AND COVERSHEET**

Plaintiff's Attorney: <u>Christopher T. Dorsel</u> Bar No. _____ Address: <u>Senn Legal, LLC</u> <u>3 Wesley Drive, Charleston, SC 29422</u> Phone: <u>(843) 556-4045</u> Fax <u>(843) 556-4046</u> E-mail: <u>chris@sennlegal.com</u> Other: _____	Defendant's Attorney: <u>Brandon S. Cabot</u> Bar No. 103554 Address: <u>Rogers, Townsend & Thomas, PC</u> <u>177 Meeting Street, Suite 320, Charleston, SC 29401</u> Phone: <u>(843)737-8612</u> Fax <u>(843)737-8584</u> E-mail: <u>brandon.cabot@rtt-law.com</u> 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: Consent Motion and Order to Consolidate for Discovery Purposes Only Under Rule 42, SCRPC	
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	<u>5/13/19</u> Date submitted
SECTION III: Motion Fee	
<input checked="" type="checkbox"/> PAID – AMOUNT: \$ <u>25.00</u> <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) IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON) CIVIL ACTION NO.: 2018-CP-10-05822

Kylie Erickson,)
))
Plaintiff,)
))
vs.)
))
James Ventures, LLC d/b/a Loggerheads)
Beach Grill, and Jenna Mattox,)
))
Defendants.)

**CONSENT MOTION AND ORDER
TO CONSOLIDATE FOR DISCOVERY
PURPOSES ONLY UNDER
RULE 42, SCRPC**

FILED
2019 MAY 21 PM 4:06
JULIE J. ARMSTRONG
CLERK OF COURT

THIS MATTER comes before this Court on Motion of Defendant James Ventures, LLC d/b/a Loggerheads Beach Grill and with consent of counsel for Plaintiff Kylie Erickson, counsel for Defendant Jenna Mattox, counsel for Plaintiff Mikala Rawlings, and counsel for Plaintiff Eric Pinckney, Jr., to consolidate this case with case number 2019-CP-10-00821, styled *Mikala Rawlings v. James Ventures, LLC d/b/a Loggerheads Beach Grill, and Jenna Mattox*, and case number 2019-CP-10-01562, styled *Eric Pinckney, Jr. v. James Ventures, LLC d/b/a Loggerheads Beach Grill*, under Rule 42, SCRPC, for discovery purposes only.

I make the following findings of law and fact:

1. Both cases arise out of the same occurrence, involve many of the same parties, and contain common questions of law and fact.
2. Consolidation of both cases for discovery purposes only would serve the interests of justice and judicial economy.
3. I hereby ORDER this case is consolidated with cases 2019-CP-10-00821 and 2019-CP-10-01562 for discovery purposes only, under case 2018-CP-10-05822. They will proceed to separate trials.

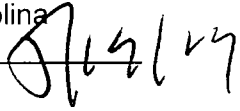
[Signature on following page]

IT IS SO ORDERED.




Roger M. Young, Sr.
Chief Administrative Judge
Ninth Judicial Circuit

Charleston, South Carolina
Dated: _____



WE SO CONSENT:

By:  _____

Lindsay K. Smith-Yancey (SC Bar# 9083)

Dir Tel: (843) 727-2211 Dir Fax: (843) 737-8584

E-mail: Lindsay.Smith-Yancey@rtt-law.com

Francis M. Ervin, II (SC Bar# 70900)

Dir Tel: (843) 737-8611 Dir Fax: (843) 737-8584

E-mail: Francis.Ervin@rtt-law.com

Brandon S. Cabot (SC Bar# 103554)

Dir Tel: (843) 737-8612 Dir Fax: (843) 737-8584

E-mail: Brandon.Cabot@rtt-law.com


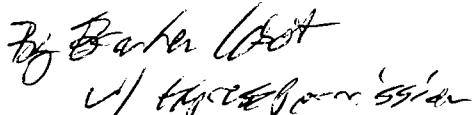
ROGERS, TOWNSEND & THOMAS, PC

177 Meeting Street, Suite 320

Charleston, S.C. 29401

*Attorneys for Defendant James Ventures, LLC d/b/a
Loggerhead's Beach Grill*

WE SO CONSENT:

By:  

Christopher T. Dorsel, Esquire
Senn Legal, LLC
3 Wesley Drive
P.O. Box 12279
Charleston, SC 29422
Tel.: (843) 556-4045
Fax: (843) 556-4046
E-mail: chris@sennlegal.com

Attorney for Plaintiff Kylie Erickson

WE SO CONSENT:

By: M. Sautter *by Blahot w/ express permission*

Michael W. Sautter, Esquire
Query Sautter & Associates, LLC
147 Wappoo Creek Dr., Suite 202
Charleston, SC 29412
Tel: (843) 795-9500
Email: mikewsautter147@aol.com

Attorney for Plaintiff Mikala Rawlings

WE SO CONSENT:

By: A. Toporek

*by Richard
K. Howell*

Alan D. Toporek, Esquire

Uricchio, Howe, Krell, Jacobson, Toporek, Theos & Keith, P.A.

17½ Broad Street

Charleston, SC 29401

Tel: (843) 723-7491

Fax: (843) 577-4179

E-mail: alan@uricchio.com

Attorney for Plaintiff Eric Pinckney, Jr.

WE SO CONSENT:

By: D. Ranaldo *By B. C. [unclear]*
with the permission

Dan Ranaldo, Esquire
Clawson & Staubes, LLC
126 Seven Farms Drive, #200
Charleston, SC 29492
Tel: (843) 577-2026
Email: dranaldo@clawsonandstaubes.com

Attorney for Defendant Jenna Mattox

ROGERS TOWNSEND & THOMAS, PC
177 MEETING STREET, SUITE 320
CHARLESTON, SOUTH CAROLINA 29401
P 843.737.8612 F 843.737.8584
W RTT-LAW.COM

BRANDON S. CABOT, ESQUIRE
SPECIAL COUNSEL
BRANDON.CABOT@RTT-LAW.COM



May 13, 2019

The Honorable Roger M. Young, Sr.
Chief Administrative Judge, Ninth Judicial Circuit
100 Broad Street, Suite 368
Charleston, SC 29401

RE: Kylie Erickson v. James Ventures, LLC d/b/a Loggerheads Beach Grill, and Jenna Mattox
Case No.: 2018-CP-10-05822
Our File No.: 22932.23

Dear Judge Young:

Enclosed please find the proposed Consent Motion and Order to Consolidate for Discovery Purposes Only Under Rule 42, SCRCP, which has been executed with express consent of all counsel in the above-referenced matter. I have also enclosed the requisite Motion and Order Information Form and Cover Sheet, as well as my firm's check in the amount of \$25.00 for the filing fee. If the Order meets with Your Honor's approval, I would appreciate it greatly if you would forward it to the Clerk's office for filing. My office will retrieve a filed copy of the Order via *CourtPlus* and will disseminate it to all parties.

By copy of this letter to all counsel of record, I am providing a copy of the Consent Motion and Order.

Thank you in advance for your consideration. Should you have any questions or require further information, please do not hesitate to contact our office.

With kindest regards, I am,

Respectfully,

ROGERS, TOWNSEND & THOMAS, PC

A handwritten signature in black ink, appearing to read "B. Cabot", written over a horizontal line.

Brandon S. Cabot

BSC/dmc

Enclosures (as stated above)

cc: Christopher T. Dorsel, Esquire (w/ enc. via e-mail)
Dan Ranaldo, Esquire (w/ enc. via e-mail)
Michael W. Sautter, Esquire (w/ enc. via e-mail)
Alan D. Toporek, Esquire (w/ enc. via e-mail)