

State of South Carolina

In the Common Pleas

County of Charleston

9th Judicial Circuit

Plaintiff(s): Nancy Mear

Case No. 2025CP1002733

vs.

Defendant(s): Eric Bournan

Motion and Order Information Form and Coversheet

Plaintiff's
Attorney:

Bar
Number:

Address:

Phone
Number:

Email:

Fax:

Other:

Defendant's
Attorney:

Robert Merting

Bar
Number:

13758

Address:

Greenville, SC 29615

Phone
Number:

864-973-6688

Email:

robert@kimandlahry.com

Fax:

Other:

Select Applicable Checkbox:

- | |
|---|
| ☐ 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:

Lift Stay

Estimated
Time Needed:

Court Reporter
Needed:

SECTION II: Motion / Order Type

Select Applicable Checkbox:

- ☒ Written motion attached
☐ Form Motion/Order

I hereby move for relief or action by the court as set forth in the attached proposed order.

Nancy Marie

Signature of Attorney for (Check One):

- ☒ Plaintiff(s)
☐ Defendant(s)

pro se

7-6-26

Date Submitted

SECTION III: Motion Fee

Check Applicable Checkbox:

- ☒ Paid

Amount Paid: \$ 25

- ☐ Exempt:

Check Reason:

- ☐ Rule to Show Cause in Child or Spousal Support
☐ Domestic Abuse or Abuse and Neglect
☐ Indigent Status
☐ State Agency v. Indigent Status
☐ Sexually Violent Predator Act
☐ Post-Conviction Relief
☐ Motion for Stay in Bankruptcy
☐ Motion for Execution (Rule 69, SCRCP)
☐ Motion for Publication
☐ 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

Lift Stay

Judge's Section

Check Reason: ☐ Motion Fee to be paid upon filing of the attached order.

☐ Other _____

Judge's Signature

Judge's Code

Date of Signature

Clerk's Verification

Collected By: _____ Date Filed: _____

☐ Motion Fee Collected: \$ _____

☐ Contested: \$ _____

Custodial Parent (if applicable): _____

**STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON**

**IN COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT**

CONGRESSWOMAN NANCY RUTH
MACE, AN INDIVIDUAL

Plaintiff,

v.

ERIC BERNARD BOWMAN

Defendant

CASE NO.: 2025CP1002733

PLAINTIFF'S MOTION TO LIFT STAY
OF PROCEEDINGS

2026 JUL -6 PM 3:13
JULIE J. ARBOSTER
CLERK OF COURT

FILED

Plaintiff, United States Representative Nancy R. Mace ("Rep. Mace") respectfully moves this Court, pursuant to its inherent authority to control its own docket and to manage the matters before it, for an Order lifting the stay of proceedings entered in this action on June 2, 2026. In support of this Motion, Plaintiff states as follows:

I. INTRODUCTION

This is a defamation action filed by Rep. Mace against Defendant Eric Bernard Bowman ("Defendant" or "Bowman"). On June 2, 2026, upon the parties' joint request, the Court entered a Consent Order staying these proceedings for 120 days. The stay was premised on the parties' adversity in multiple forums and the resulting need for coordination among the parties and courts. Those circumstances no longer warrant continued suspension of this action. The coordination concern that animated the stay has diminished, and Defendant's Motion to Dismiss is fully briefed and ripe for decision, a discrete, threshold question of South Carolina law that the Court may resolve on the existing record without disturbing the parties' separate federal proceeding. Plaintiff, now proceeding pro se, is prepared to move this matter forward. For the

reasons set forth below, the stay should now be lifted so that this action may proceed to resolution on the merits.

II. RELEVANT BACKGROUND

Plaintiff commenced this action by filing her Complaint on or about May 12, 2025, asserting claims for defamation with actual malice arising from statements published by Defendant.

Defendant moved to dismiss the Complaint on or about July 9, 2025. That motion was fully briefed upon the filing of Plaintiff's opposition on or about October 6, 2025, and has remained ripe for the Court's determination since that time.

On June 2, 2026, the Court entered a Consent Order for Stay of Proceedings (the "Stay Order"), granting the parties' joint motion for a 120-day stay. The Stay Order recognized that "[t]he granting of a motion for a stay of proceedings rests entirely within the discretion of the trial [court]," and found that a stay would "best serve the interests of all parties involved" because the parties were "adverse to each other in multiple forums on different facts," creating complexity that required coordination among the parties and courts.

Plaintiff is now proceeding pro se in this matter, as reflected in the Notice filed June 30, 2026, and is prepared to proceed with the litigation. Plaintiff has acknowledged that her pro se status will not serve as a basis for any continuance, stay, or delay in the matter.

III. LEGAL STANDARD

The decision to grant, deny, or dissolve a stay of proceedings rests within the sound discretion of the trial court. *Thompson v. Swicegood*, 430 S.C. 648, 659, 845 S.E.2d 920, 925 (Ct. App. 2020). A stay is appropriate only where it "would best serve the interests of all parties involved." *Talley v. Johns-Manville Sales Corp.*, 285 S.C. 117, 119, 328 S.E.2d 621, 623 (1985).

The same discretion that permits a court to enter a stay necessarily permits the court to lift or modify that stay when the circumstances supporting it have changed or when continuation of the stay no longer serves the interests of the parties.

IV. ARGUMENT

A. The Circumstances Justifying the Stay No Longer Warrant Its Continuation.

The Stay Order rested on a single, specific rationale: that the parties were “adverse to each other in multiple forums on different facts,” creating complexity that required coordination among the parties and courts. That rationale no longer supports holding this action in abeyance. Defendant’s Motion to Dismiss is fully briefed and ripe, and presents a threshold question of South Carolina law to be decided on the face of the Complaint and the existing record - without discovery and without coordination with the parties’ separate federal proceeding.

Moreover, the coordination concern that animated the Stay Order has itself diminished. The federal action concerns different claims and facts that do not overlap with the threshold state-law question presented by the pending Motion to Dismiss. As a result, there is no longer any coordination among forums or courts that continued suspension of this action is needed to manage, and the premise on which the Court found a stay would “best serve the interests of all parties involved” no longer holds.

Because the basis on which the Court found that a stay would “best serve the interests of all parties involved” no longer exists, continuation of the stay is no longer warranted, and the action should proceed - beginning with resolution of the pending Motion to Dismiss.

B. Continued Delay Prejudices Plaintiff.

Plaintiff filed this action to vindicate her reputation against statements she alleges are false, defamatory, and made with actual malice to impugn her reputation and injure her career.

The continued suspension of these proceedings prolongs the alleged reputational harm and defers Plaintiff's opportunity to obtain relief. The reputational injury Rep. Mace alleges is ongoing in nature, and further delay only compounds it. The interests of all parties are now best served by allowing the case to move forward.

C. Lifting the Stay Will Not Prejudice Defendant and Serves Judicial Economy.

Lifting the stay would return this matter to its normal course and permit orderly resolution of the claims on their merits. The pending Motion to Dismiss has been fully briefed for months and requires no further effort to decide; there are no overlapping discovery burdens; and both parties are able to litigate this matter on its own facts. Allowing the action to proceed promotes the efficient administration of justice and the prompt resolution of the dispute.

V. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that the Court enter an Order lifting the stay of proceedings entered on June 2, 2026, restoring this action to the active docket so that Defendant's fully-briefed Motion to Dismiss may be decided and the matter may proceed, and granting such other and further relief as the Court deems just and proper.

Dated: July 6, 2026

Respectfully Submitted,

A handwritten signature in black ink that reads "Nancy Mace". The signature is written in a cursive, flowing style.

/s/ Signature
Rep. Nancy R. Mace
Pro Se
295 Seven Farms Drive, Suite C-186
Charleston, SC 29492
843.475.9139, nancy@nancymace.org