

From: [Sohayla Townes](#)
To: [Todd, Sallie B.](#)
Cc: [Court Of Appeals Filings](#); [Justin Lucey](#); [Lee Weiland](#); [Transcripts](#); [Joshua Evans](#); [kbattle@battlelawsc.com](#); [Mike Battle](#); [Andrew Lindemann](#); [jennifer@ldh-law.com](#); [lthomas@richardsonplowden.com](#); [ljennelle@richardsonplowden.com](#); [Lynn@clarkbolen.com](#); [Jennifer Zambriczki](#)
Subject: FW: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request
Date: Wednesday, March 27, 2024 11:27:47 AM
Attachments: [Christmas.vs.Georgetown.Corrections.JOLPA.responses.docx](#)

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Thank you, Ms. Todd. We have reviewed your comments and added our responses to your two queries on page 1 of the attached.

We noted that your list does not include the concern areas we set out on February 28. Is there a more complete list of the areas you reviewed and corrected that you could send to us? In addition, the last seven items in the attached do not include notations by you. Could you please confirm you were able to finish your review and let us know your responses on each?

Thank you, again, for your time. We look forward to hearing from you.

Sohayla Townes

Sohayla Townes, Esq.
JUSTIN O'TOOLE LUCEY, PA
415 Mill Street
Mt Pleasant, SC 29464
(843) 830-9049

From: Todd, Sallie B. <sbtodd@sccourts.org>
Sent: Wednesday, March 20, 2024 9:52 PM
To: Sohayla Townes <stownes@lucey-law.com>
Cc: Court Of Appeals Filings <ctappfilings@sccourts.org>; Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>
Subject: Re: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Please find attached the Amended Christmas vs County trial transcript, along with the requested changes/responses.

Thanks,
Sallie Beth Todd

From: Todd, Sallie B. <sbtodd@sccourts.org>

Sent: Sunday, March 17, 2024 11:26 PM

To: Sohayla Townes <stownes@lucey-law.com>

Cc: Court Of Appeals Filings <ctappfilings@sccourts.org>; Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com <kbattle@battlelawsc.com>; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com <jennifer@ldh-law.com>; lthomas@richardsonplowden.com <lthomas@richardsonplowden.com>; ljennelle@richardsonplowden.com <ljennelle@richardsonplowden.com>; Lynn@clarkbolen.com <Lynn@clarkbolen.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>

Subject: Re: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Good evening,

As you can imagine, it is taking a long time to go through each item of concern, pull the audio, listen to that portion, and then make any necessary changes. I have reviewed all concerns up to the last ones provided on 3/12. To this point I have made some changes. I should be finished reviewing the last set which is pages 400 - 700 within the next few days. I will have the amended transcript to you by the middle of the week.

I hope this helps and if you have any other questions, please let me know.

Thanks,
Sallie Beth

From: Sohayla Townes <stownes@lucey-law.com>

Sent: Tuesday, March 12, 2024 4:58 PM

To: Todd, Sallie B. <sbtodd@sccourts.org>

Cc: Court Of Appeals Filings <ctappfilings@sccourts.org>; Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com <kbattle@battlelawsc.com>; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com <jennifer@ldh-law.com>; lthomas@richardsonplowden.com <lthomas@richardsonplowden.com>; ljennelle@richardsonplowden.com <ljennelle@richardsonplowden.com>; Lynn@clarkbolen.com <Lynn@clarkbolen.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>

Subject: FW: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

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Ms. Todd,

Good afternoon. Attached please find the remainder of the transcription concerns we have

noted on pages 401-700, which supplement the notations we previously circulated.

Regarding your March 7 email, while we appreciate that you prefer to issue a single updated final transcript, we would appreciate it if you would 1) let us know if you have made any edits as a result of the initial Feb. 28 list; and 2) when we can expect the complete edited transcript.

We appreciate your time and attention to this matter.

Regards,

Sohayla Townes

Sohayla Townes, Esq.
JUSTIN O'TOOLE LUCEY, PA
415 Mill Street
Mt Pleasant, SC 29464
(843) 830-9049

From: Sohayla Townes

Sent: Friday, March 8, 2024 4:10 PM

To: Todd, Sallie B. <sbtodd@sccourts.org>

Cc: ctappfilings@sccourts.org; Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; transcripts@sccourts.org; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>

Subject: Re: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Good afternoon Ms. Todd,

Thank you for the update. As previously noted, please find additional transcript notations identifying areas of concern on pages 101-400 attached. We continue to work our way through the remainder of the transcript and expect that we may be preparing one additional supplement.

Regards,

Sohayla Townes

Sohayla Townes, Esq.
JUSTIN O'TOOLE LUCEY, PA
415 Mill Street
Mt Pleasant, SC 29464
(843) 830-9049

From: Todd, Sallie B. <sbtodd@sccourts.org>

Sent: Thursday, March 7, 2024 10:42 AM

To: Sohayla Townes <stownes@lucey-law.com>
Cc: Court Of Appeals Filings <ctappfilings@sccourts.org>; Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>
Subject: Re: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Good morning,

I am currently working on the review. Once I have received all of your concerns to be reviewed, I will then review and return an updated final transcript to you. I don't want to send it in portions as I think that will be confusing.

Thanks,
Sallie Beth

From: Sohayla Townes <stownes@lucey-law.com>
Sent: Wednesday, March 6, 2024 5:54 PM
To: Todd, Sallie B. <sbtodd@sccourts.org>
Cc: Court Of Appeals Filings <ctappfilings@sccourts.org>; Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com <kbattle@battlelawsc.com>; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com <jennifer@ldh-law.com>; lthomas@richardsonplowden.com <lthomas@richardsonplowden.com>; ljennelle@richardsonplowden.com <ljennelle@richardsonplowden.com>; Lynn@clarkbolen.com <Lynn@clarkbolen.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>
Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

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Dear Ms. Todd,

We have identified some additional areas of concern in the first 100 pages of the transcript. They are set out in the attached for your review.

As to the excerpts Justin Lucey circulated last Wednesday, you indicated that you would respond by the first of the week, which we understood to mean

March 4 or yesterday, March 5. We have not yet received your response. Could you please update us on when it is to arrive?

Please further note we expect to have additional transcript pages and notations ready to send to you by this Friday, March 8.

Regards,

Sohayla Townes

Sohayla Townes, Esq.
JUSTIN O'TOOLE LUCEY, PA
415 Mill Street
Mt Pleasant, SC 29464
(843) 830-9049

From: Todd, Sallie B. <sbtodd@sccourts.org>
Sent: Wednesday, February 28, 2024 10:52 AM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>
Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>
Subject: Re: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

I will look over these and make any corrections necessary and respond by the first of next week.

If you need anything further, please let me know.

Thanks,
Sallie Beth

From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Sent: Wednesday, February 28, 2024 10:38 AM
To: Justin Lucey <jlucey@lucey-law.com>; Todd, Sallie B. <sbtodd@sccourts.org>; Court Of Appeals Filings <ctappfilings@sccourts.org>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>
Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com

<jennifer@ldh-law.com>; lthomas@richardsonplowden.com
<lthomas@richardsonplowden.com>; ljennelle@richardsonplowden.com
<ljennelle@richardsonplowden.com>; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com <Lynn@clarkbolen.com>; Jennifer
Zambriczki <jzambriczki@lucey-law.com>

Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of
Georgetown // Trial Transcript Preservation and Correction Request

Dear Counsel:

The Court has received your filing. A stamped copy is attached
for your records.

Thank you.

From: Justin Lucey <jlucey@lucey-law.com>

Sent: Wednesday, February 28, 2024 10:37 AM

To: Todd, Sallie B. <sbtodd@sccourts.org>; Court Of Appeals Filings
<ctappfilings@sccourts.org>; Lee Weiland <lweiland@lucey-law.com>;
Transcripts <transcripts@sccourts.org>

Cc: Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com;
Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann
<andrew@ldh-law.com>; jennifer@ldh-law.com;
lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com;
Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com;
Jennifer Zambriczki <jzambriczki@lucey-law.com>; Justin Lucey
<jlucey@lucey-law.com>

Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of
Georgetown // Trial Transcript Preservation and Correction Request

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organization. Please exercise caution before clicking any links or
opening attachments. ***

Ms. Todd,

Attached please find various transcript excerpts where the speakers
appear to be mis identified or words appear to be missing.

At this time, we have only gotten through several sections of the
transcript, and will continue working our way though it to see if there
are other areas of concern.

Please advise when you will have an opportunity to check these areas
and when we should expect to hear from you.

Justin Lucey

From: Todd, Sallie B. <sbtodd@sccourts.org>
Sent: Tuesday, February 27, 2024 10:09 AM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Lee Weiland <lweiland@lucey-law.com>; Transcripts <transcripts@sccourts.org>
Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>
Subject: Re: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Please find the attached letter dated 2/27/2024 in response to the letter from Mr. Lucey dated 2/23/2024.

If you need anything further from me, please let me know.

Thanks,
Sallie Beth Todd

From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Sent: Friday, February 23, 2024 1:45 PM
To: Lee Weiland <lweiland@lucey-law.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>; Todd, Sallie B. <sbtodd@sccourts.org>; Transcripts <transcripts@sccourts.org>
Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com <kbattle@battlelawsc.com>; Mike Battle <mbattle@battlelawsc.com>; Andrew Lindemann <andrew@ldh-law.com>; jennifer@ldh-law.com <jennifer@ldh-law.com>; lthomas@richardsonplowden.com <lthomas@richardsonplowden.com>; ljennelle@richardsonplowden.com <ljennelle@richardsonplowden.com>; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com <Lynn@clarkbolen.com>; Jennifer Zambriczki <jzambriczki@lucey-law.com>
Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Lee Weiland <lweiland@lucey-law.com>
Sent: Friday, February 23, 2024 1:44 PM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Todd, Sallie B. <sbtodd@sccourts.org>; Transcripts <transcripts@sccourts.org>
Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>; Lynn@clarkbolen.com; Jennifer Zambriczki <jzambriczki@lucey-law.com>
Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Dear Ms. Todd:

Good afternoon. Please find attached correspondence sent on behalf of Justin Lucey concerning the above-referenced matter.

Thank you,
Lee

Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.
Direct: (912) 228-8427
[https://link.edgепilot.com/s/64ee6eb3/pc8d2scayEiLO9miPhZytA?](https://link.edgепilot.com/s/64ee6eb3/pc8d2scayEiLO9miPhZytA?u=http://www.lucey-law.com/)
[u=http://www.lucey-law.com/](http://www.lucey-law.com/)

From: Lee Weiland
Sent: Thursday, February 15, 2024 1:59 PM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>; Todd, Sallie B. <sbtodd@sccourts.org>; transcripts@sccourts.org
Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com; Sohayla Townes <stownes@lucey-law.com>
Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Preservation and Correction Request

Dear Ms. Todd:

Good afternoon. Thank you for the delivery of the trial transcript regarding the above-referenced case. After review, we have noticed several transcription issues. Therefore, we request a time to listen to the tapes and that all tapes be preserved until further notice.

We look forward to hearing from you and/or the Court on how to proceed with correcting the transcript.

Sincerely,
Lee

Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.
Direct: (912) 228-8427
<https://link.edgепilot.com/s/64ee6eb3/pc8d2scayEiLO9miPhZytA?u=http://www.lucey-law.com/>

From: Court Of Appeals Filings <ctappfilings@sccourts.org>
Sent: Wednesday, February 14, 2024 9:32 AM
To: Lee Weiland <lweiland@lucey-law.com>; Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Justin Lucey <jlucey@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com
Subject: RE: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Received

Dear Counsel:

The Court has received your filing. A stamped copy is attached for your records.

Thank you.

From: Lee Weiland <lweiland@lucey-law.com>
Sent: Wednesday, February 14, 2024 9:27 AM
To: Court Of Appeals Filings <ctappfilings@sccourts.org>
Cc: Justin Lucey <jlucey@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>; Joshua Evans <jevans@lucey-law.com>; kbattle@battlelawsc.com; mbattle@battlelawsc.com; andrew@ldh-law.com; jennifer@ldh-law.com; lthomas@richardsonplowden.com; ljennelle@richardsonplowden.com
Subject: Appellate Case No. 2023-001454 Christmas v. County of Georgetown // Trial Transcript Received

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Good morning,

Please find attached for filing the trial transcript and certification served upon us last night via email from the Trial Court Reporter Sallie Todd.

Thank you,
Lee

Lee Weiland
Senior Paralegal
Justin O'Toole Lucey, P.A.
Direct: (912) 228-8427
[https://link.edgепilot.com/s/66c32a3b/TJFMH6dWrU2QtWCnxKL43g?
u=http://www.lucey-law.com/](https://link.edgепilot.com/s/66c32a3b/TJFMH6dWrU2QtWCnxKL43g?u=http://www.lucey-law.com/)

From: Todd, Sallie B. <sbtodd@sccourts.org>
Sent: Tuesday, February 13, 2024 7:22 PM
To: Joshua Evans <jevans@lucey-law.com>; Lee Weiland <lweiland@lucey-law.com>
Subject: Christmas vs Georgetown

Please find attached the Christmas vs Georgetown trial transcript, along with the Certificate Page and Invoice for the same.

If you need anything else, please let me know. Again, I am sorry for the delay with this one.

Thanks,

Sallie Beth Todd
~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known

threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.

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<20240307 Christmas - Transcript Concerns Pages 101-400.docx>

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