

Aug 26 2024

SC Court of Appeals

**From:** [Evans-Pryor, Khee'Asia](#)  
**To:** [Court Of Appeals Filings](#)  
**Subject:** FW: Ina Shtukar v. Erie Insurance Group- 2024-001311  
**Date:** Monday, August 26, 2024 8:38:15 AM

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**From:** Ina S. Steinberg Esq. <[ina@blackandwhiteimmigrationlaw.org](mailto:ina@blackandwhiteimmigrationlaw.org)>  
**Sent:** Friday, August 23, 2024 11:39 AM  
**To:** Evans-Pryor, Khee'Asia <[kpryor@sccourts.org](mailto:kpryor@sccourts.org)>  
**Cc:** [emartineau@martineauking.com](mailto:emartineau@martineauking.com); [paralegal@martineauking.com](mailto:paralegal@martineauking.com); [inashtukar@gmail.com](mailto:inashtukar@gmail.com)  
**Subject:** Re: Ina Shtukar v. Erie Insurance Group- 2024-001311

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Dear Clerk of Court:

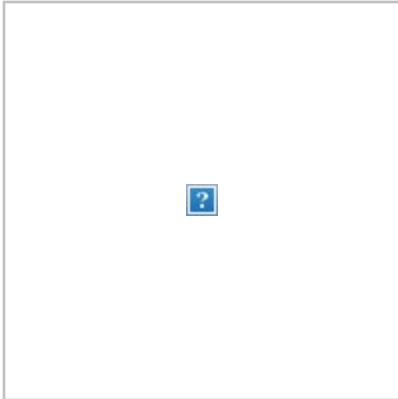
In light of the Notice from the Clerk's Office concerning Rule 207 deadline, I believe it is prudent to notify your Office that the undersigned filed a Rule 59(e) Motion on August 18, 2024, asking Judge Hall to reconsider his rulings, in light of numerous errors of law contained in the Memorandum of Opinion issued on August 16, 2024. Moreover, the undersigned notes that the way Judge Hall and Defendant charged with drafting a proposed order handled the final Order and Memorandum of Opinion deprived the undersigned of an opportunity to raise the issues brought to light by the Opinion, to the extent the Court issued a Form 4 Order (which did not explain its reasoning) on August 6, 2024, triggering the clock for the notice of appeal, but delayed issuing its Opinion until August 16, 2024, which marked the deadline for the Appellant's notice of appeal ("NOA"). The undersigned also notes that the defense attorney failed to serve her proposed order prior to submitting it to Judge Hall pursuant to Rule 5. Anticipating this very issue (i.e., being procedurally deprived of a fair opportunity to take advantage of rule 59 to challenge new issues raised by Judge Hall's Memorandum of Opinion and to timely note her appeal), the undersigned filed her NOA on August 6, 2024, to preserve her right to appeal and ordered a transcript the following day, on August 7, 2024. However, because the undersigned had to also file a Rule 59(e) motion in light of the issues raised by Judge Hall's Opinion, I believe all deadlines should be stayed until Judge Hall rules on said motion, pursuant to Rule 59(f), and intend to file a motion to that extent.

Relatedly, the undersigned respectfully asks for a clarification as to whether the opposing counsel communicated with the Clerk's Office without copying the undersigned, to the extent the email sent by your Office on August 22, 2024, copied not only the defense attorney but also her paralegal. None of the undersigned's prior correspondence to the Clerk's Office copied the paralegal, which suggests *ex parte* communication between the defense attorney and the Clerk's Office. In light of other ethical concerns which arose during the course of the litigation below, Judge Hall's inexplicable rulings contrary to well settled law, and the opposing counsel's failure to serve her proposed order, the undersigned desires to note her concerns on the record.

Respectfully submitted,  
August 23, 2024

Very truly yours,  
Ina Shtukar Steinberg, Esquire

**\*This office does not accept walk-ins. By appointment only.**



Licensed in North Carolina and South Carolina

BLACK & WHITE LAW, LLP

[www.blackandwhiteimmigrationlaw.org](http://www.blackandwhiteimmigrationlaw.org)

1687 Saybrook Court

Rock Hill, SC 29732

704-309-0993 or 704-309-0992

[ina@blackandwhiteimmigrationlaw.org](mailto:ina@blackandwhiteimmigrationlaw.org)

*Effective April 1, 2024, USCIS will increase filing fees. The increases will be based on visa category and company size/non-profit status. The new fees can be found here:*

<https://www.uscis.gov/sites/default/files/document/forms/g-1055.pdf>

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On Thu, Aug 22, 2024 at 2:40 PM Ina S. Steinberg Esq. <[ina@blackandwhiteimmigrationlaw.org](mailto:ina@blackandwhiteimmigrationlaw.org)> wrote:

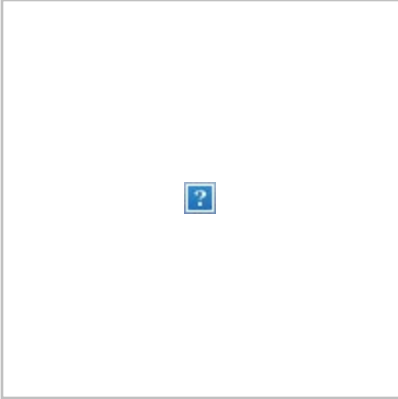
Good afternoon:

Please be advised that the undersigned ordered a transcript on August 7, 2024. (Please see attached Transcript request Form and Emails documenting that this request was timely submitted). I had to follow up with the court reporter on August 19, 2024. I received an estimate on August 20, 2024, and confirmed the order the following day, on August 21, 2024. The opposing counsel was copied on each of my emails to the court reporter. However, I neglected to copy the Court of Appeals on my correspondence to the court reporter. I apologize for the oversight.

Please advise if I need to submit anything else. Thank you for your assistance with this matter.

Very truly yours,  
Ina Shtukar Steinberg, Esquire

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On Thu, Aug 22, 2024 at 1:57 PM Evans-Pryor, Khee'Asia <[kpryor@sccourts.org](mailto:kpryor@sccourts.org)> wrote:

Dear Counsel,

Attached please find correspondence from the Court of Appeals.

**Please do not respond to this email.** Send all correspondence to [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org).  
**Any parties not included in this email will receive the attached correspondence via US Mail.**

Respectfully,

**Khee'Asia Evans-Pryor**

Appeals Specialist 1

South Carolina Court of Appeals

1220 Senate Street, Columbia, SC 29201

803-734-1890

E-filing: [ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

Website: [www.sccourts.org](http://www.sccourts.org)

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