

BLACK & WHITE LAW, LLP



RECEIVED

Aug 28 2024

SC Court of Appeals

Ina Shtukar “Steinberg” Esq.
Black & White Law, LLP
Blackandwhiteimmigrationlaw.org
1687 Saybrook Court

Rock Hill, SC 29732
704-309-0993 or 704-309-0992
ina@blackandwhiteimmigrationlaw.org

August 28, 2024

VIA EMAIL

South Carolina Court of Appeals

1220 Senate St
Columbia, SC 29201

Re: Ina Shtukar v. Erie Insurance Group/ Appellate Case No. 2024-001311

Dear Clerk of the Court of Appeals:

Please allow this correspondence to serve as Appellant’s response to the correspondence dated August 22, 2024, which reminded the undersigned about Rule 207, SCRAP, and instructed Appellant to advise the Court on the status of the transcript. The notice also instructed the undersigned to copy the Court of Appeals on her communications with the court reporter.

Please be advised that Appellant ordered a transcript on August 7, 2024. (Please see attached Transcript request Form and Emails documenting that this request was timely submitted as **Exhibits, A, B, and C**). Appellant had to follow up with the court reporter on August 19, 2024, as reflected in the emails. Appellant 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 the emails to the court reporter. However, the undersigned Appellant neglected to copy the Court of Appeals on her correspondence to the court reporter. The undersigned apologize for the oversight. Since receiving the August 22, 2024, correspondence, the undersigned has corrected her oversight and copied the Court on her communications to the court reporter.

Please also be advised that the transcript was completed on August 26, 2024, and Appellant paid the Invoice on August 27, 2024. (Please see attached correspondence exchanged with the court reporter, Invoice, and Receipt, as **Exhibits D, E, and F**). Thank you for your assistance with this matter.

Respectfully,

/s/ *Ina S. Steinberg*

Ina Shtukar “Steinberg” Esq.



South Carolina Judicial Branch

TRANSCRIPT REQUEST FORM

EXHIBIT A

Pursuant to Rule 207 and 607 of the South Carolina Appellate Court Rules, the transcribed paper copy is the official record of court proceedings. You may request a transcript by completing this form and emailing it to the Court Reporter/Transcriptionist and to South Carolina Court Administration at transcripts@sccourts.org. If WebEx or DCRP were used to capture the record, please indicate below and send the form to transcripts@sccourts.org.

Requestor's Information			
Full Name Ina Shtukar "Steinberg"		Law Firm/Agency Black & White Law LLP	
Email Address ina@blackandwhiteimmigrationlaw.org		Phone Number 704-309-0993	
Mailing Address 1687 Saybrook Ct, Rock Hill, SC 29732			
Is the requestor a party in the case? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
If no, does the requestor represent a party? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, name of party			
Transcript Information			
Docket Number 2023CP4600392	Full Case Caption (i.e. State v. John Doe or John Smith v. Jane Smith) Ina Shtukar VS Erie Insurance Exchange et al		Circuit <input checked="" type="checkbox"/> Family <input type="checkbox"/>
Date(s) of Proceeding 7/31/2024 at 9:00 AM	County York	Appeal pending <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Death Penalty <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Presiding Judge Dan Hall		Special Circumstances Is the hearing to be transcribed one of the following: <input type="checkbox"/> Termination of parental rights <input type="checkbox"/> Adoption <input type="checkbox"/> Any actions involving child custody/visitation.	
Opposing Counsel(s) (name and email address) Elizabeth Martineau			
Court Reporter(s) Steven Holzknrecht, DCRP	<input type="checkbox"/> WebEx <input type="checkbox"/> DCRP	Delivery Timeframe (check Rule 607 for current page rates) <input type="checkbox"/> Quote <input type="checkbox"/> Rough Draft <input type="checkbox"/> Overnight delivery <input type="checkbox"/> Daily delivery <input type="checkbox"/> Expedited delivery (7 days) Due on/before: <input checked="" type="checkbox"/> Regular delivery (60 days)	
Portion of proceeding to be transcribed <input checked="" type="checkbox"/> Entire hearing <input type="checkbox"/> Voir dire by juror <input type="checkbox"/> Jury selection <input type="checkbox"/> Plaintiff's opening statement <input type="checkbox"/> Defendant's opening statement <input type="checkbox"/> Plaintiff's closing arguments <input type="checkbox"/> Defendant's closing arguments <input type="checkbox"/> Entire direct examination <input type="checkbox"/> Entire cross examination <input type="checkbox"/> Entire redirect <input type="checkbox"/> Examination of witness (W) by attorney (A) W: _ A: _ <input type="checkbox"/> Ruling of the court		Delivery Method (additional fees may apply) <input checked="" type="checkbox"/> PDF / Email <input type="checkbox"/> Hard Copy/Priority Mail (\$50 + shipping) <input type="checkbox"/> PDF & Hard Copy/Priority Mail (\$50 + shipping)	
		Responsible Payor <input checked="" type="checkbox"/> Private / Self <input type="checkbox"/> Court Appointed Counsel Appeals Attorney Email <input type="checkbox"/> Other	
Next Hearing Date			

Requestor's Signature: s/ Ina Shtukar Steinberg Date: 08/07/2024
(Typed name will serve as signature)

NOTE: Requests will be processed pursuant to Rule 207 and 607 of the SCACR. Rule 607(h) governs the fees for transcripts, which are not provided for free or at reduced rates to any party, regardless of indigent status. Please promptly submit your payment in the method of payment requested, in order for the transcript to be produced. In some cases, a deposit may be required before the transcript can be placed in the production queue. You may also request a quote before deciding to order. *If you need to cancel the transcript request for any reason, you are responsible for paying for the pages of the transcript that have already been completed at the time of the cancellation.*

If you are ordering a transcript pursuant to Rule 207(a)(1), SCACR, you must contemporaneously furnish all parties, the Office of Court Administration, and the clerk of the appellate court with copies of all correspondence with the court reporter or transcriptionist.

**EXHIBIT B**

Ina S. Steinberg Esq. <ina@blackandwhiteimmigrationlaw.org>

Ina Shtukar VS Erie Insurance Exchange, aka Erie Insurance Group, Erie Insurance Company, and Erie Insurance-2023CP4600392

3 messages

Ina S. Steinberg Esq. <ina@blackandwhiteimmigrationlaw.org>
To: transcripts@sccourts.org, sholzknicht@sccourts.org
Cc: Elizabeth Martineau <emartineau@martineauking.com>

Wed, Aug 7, 2024 at 1:49 PM

Dear Mr. Steven Holzknicht:

Please find attached Appellant's Transcript Request Form for the above referenced case, which is being appealed. Thank you for your assistance with this matter. The opposing counsel is duly copied on this email.

Respectfully submitted,
August 7, 2024

Very truly yours,
Ina Shtukar Steinberg, Esquire

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

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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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 **Transcript Request Form-ISS v Erie.pdf**
486K

Transcripts <transcripts@sccourts.org>
To: "Ina S. Steinberg Esq." <ina@blackandwhiteimmigrationlaw.org>
Cc: Transcripts <transcripts@sccourts.org>

Wed, Aug 7, 2024 at 2:59 PM

Good afternoon

Your transcript request has been received by our office. You should receive communication from a transcriptionist within 5 days with an estimated cost for production.

Thank you.

Court Reporter Section

From: Ina S. Steinberg Esq. <ina@blackandwhiteimmigrationlaw.org>

Sent: Wednesday, August 7, 2024 1:49 PM

To: Transcripts <transcripts@sccourts.org>; Holzknecht, Steven <sholzknacht@sccourts.org>

Cc: Elizabeth Martineau <emartineau@martineauking.com>

Subject: Ina Shtukar VS Erie Insurance Exchange, aka Erie Insurance Group, Erie Insurance Company, and Erie Insurance-2023CP4600392

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

Dear Mr. Steven Holzknacht:

Please find attached Appellant's Transcript Request Form for the above referenced case, which is being appealed. Thank you for your assistance with this matter. The opposing counsel is duly copied on this email.

Respectfully submitted,

August 7, 2024

Very truly yours,

Ina Shtukar Steinberg, Esquire

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**Ina S. Steinberg Esq.** <[ina@blackandwhiteimmigrationlaw.org](mailto:ina@blackandwhiteimmigrationlaw.org)>  
To: Transcripts <[transcripts@sccourts.org](mailto:transcripts@sccourts.org)>, [sholzknacht@sccourts.org](mailto:sholzknacht@sccourts.org)  
Cc: Elizabeth Martineau <[emartineau@martineauking.com](mailto:emartineau@martineauking.com)>

Mon, Aug 19, 2024 at 1:17 PM

Good afternoon:

I am following up on this transcript request. Please advise. Thank you.

Very truly yours,  
Ina Shtukar Steinberg, Esquire

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8/22/24, 2:30 PM

BLACK & WHITE LAW, LLP Mail - Ina Shtukar VS Erie Insurance Exchange, aka Erie Insurance Group, Erie Insurance Company, a...

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[Quoted text hidden]



Ina S. Steinberg Esq. <ina@blackandwhiteimmigrationlaw.org>

# Shtukar v Erie Insurance Transcript

# EXHIBIT C

2 messages

**Kevin Dehlinger** <kdehlinger@legaleagleinc.com>  
To: "ina@blackandwhiteimmigrationlaw.org" <ina@blackandwhiteimmigrationlaw.org>  
Cc: Transcripts <transcripts@sccourts.org>

Tue, Aug 20, 2024 at 2:27 PM

Ina,

Today, Legal Eagle was assigned your transcript request in the above referenced matter. Based upon our review of the records, it appears this transcript will be approximately 20 pages long. The following was indicated on the request from:

- Standard Delivery (60 Days)
- PDF/Email Requested

The estimated standard delivery cost for this transcript is \$85.00.

*Please note that the page estimate is not guaranteed. The price indicated above is an approximation based on the audio length. The actual cost and page count may vary due to several factors including but not limited to speech rate, side bars, Q&A v Colloquy, and hearing type. A final invoice will be sent when the transcript is completed.*

***Please include any attorneys who were present at each hearing and who they represented with your confirmation as the attorneys are not always introduced in the audio.***

Once you have authorized us to proceed by responding to this email, we will place your transcript inline for production with a 60-day due date, although transcripts are usually completed much earlier. If you have any questions, please let us know.

Thank you,



**Kevin Dehlinger**

Director of Operations

M (864) 444-4219 | P (864) 467-1373

E [kdehlinger@legaleagleinc.com](mailto:kdehlinger@legaleagleinc.com)

[107 LeGrand Blvd., Greenville, SC 29607](https://www.LegalEagleInc.com)

[www.LegalEagleInc.com](https://www.LegalEagleInc.com)





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---

Ina S. Steinberg Esq. <ina@blackandwhiteimmigrationlaw.org>

Wed, Aug 21, 2024 at 8:37 AM

To: Kevin Dehlinger <kdehlinger@legaleagleinc.com>

Cc: Transcripts <transcripts@sccourts.org>, Elizabeth Martineau <emartineau@martineauking.com>

Good morning Kevin:

Thank you for your email. Confirmed - please proceed. Elizabeth Martineau (copied on this email) represents Erie Insurance and she was the one who argued the motion. The undersigned represents herself in this matter.

Very truly yours,  
Ina Shtukar Steinberg, Esquire

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[Quoted text hidden]



Ina S. Steinberg Esq. <ina@blackandwhiteimmigrationlaw.org>

## Shtukar v Erie Insurance Transcript

6 messages

**Kevin Dehlinger** <kdehlinger@legaleagleinc.com>  
To: "ina@blackandwhiteimmigrationlaw.org" <ina@blackandwhiteimmigrationlaw.org>  
Cc: Transcripts <transcripts@sccourts.org>

Tue, Aug 20, 2024 at 2:27 PM

Ina,

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Thank you,



**Kevin Dehlinger**

Director of Operations

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Ina S. Steinberg Esq. <ina@blackandwhiteimmigrationlaw.org>

Wed, Aug 21, 2024 at 8:37 AM

To: Kevin Dehlinger <kdehlinger@legaleagleinc.com>

Cc: Transcripts <transcripts@sccourts.org>, Elizabeth Martineau <emartineau@martineauking.com>

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Very truly yours,  
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[Quoted text hidden]

---

**Kevin Dehlinger** <kdehlinger@legaleagleinc.com>  
To: "Ina S. Steinberg Esq." <ina@blackandwhiteimmigrationlaw.org>

Mon, Aug 26, 2024 at 4:09 PM

Ina,


Attached are the transcript and invoice for the above referenced matter. If you have any questions after the review of the transcript, please let us know. We would be happy to revisit any concerns. Thank you.

[Quoted text hidden]

[Quoted text hidden]

---

**2 attachments**

 **Invoice 103896.pdf**  
108K

 **Ina Shtukar vs Erie Insurance Exchange, et al 7-31-24 Transcript.pdf**  
125K

---

**Ina S. Steinberg Esq.** <ina@blackandwhiteimmigrationlaw.org>

Mon, Aug 26, 2024 at 5:46 PM

To: Kevin Dehlinger <kdehlinger@legaleagleinc.com>

Cc: Elizabeth Martineau <emartineau@martineauking.com>, Court Of Appeals Filings <ctappfilings@sccourts.org>

Thank you, Kevin. Is there a way to pay the invoice online? What are my payment options? Thank you in advance.

I have previously neglected to copy the Court of Appeals, and this was brought to my attention, so I have copied the Court and the opposing counsel (which I have always done).

Very truly yours,  
Ina Shtukar Steinberg, Esquire

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[Quoted text hidden]

---

**Kevin Dehlinger** <[kdehlinger@legaleagleinc.com](mailto:kdehlinger@legaleagleinc.com)>  
To: "Ina S. Steinberg Esq." <[ina@blackandwhiteimmigrationlaw.org](mailto:ina@blackandwhiteimmigrationlaw.org)>

Tue, Aug 27, 2024 at 8:17 AM

Ina,

Payment can be made by mailing a check made out to Legal Eagle at the address below:

Legal Eagle, PO Box 5682, Greenville, SC 29606

You may also go to our website and make payment through our portal. Please be sure to reference the invoice number. The web address is below:

<https://app.gotnpgateway.com/checkout/22b467cb-00ea-4e9f-953a-641e3c4b8889>

If you have any other questions, please let me know. Thank you.

[Quoted text hidden]

[Quoted text hidden]

---

**Ina S. Steinberg Esq.** <[ina@blackandwhiteimmigrationlaw.org](mailto:ina@blackandwhiteimmigrationlaw.org)>  
To: Kevin Dehlinger <[kdehlinger@legaleagleinc.com](mailto:kdehlinger@legaleagleinc.com)>  
Cc: Court Of Appeals Filings <[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)>, Elizabeth Martineau <[emartineau@martineauking.com](mailto:emartineau@martineauking.com)>

Tue, Aug 27, 2024 at 5:40 PM

Thank you, Kevin. The invoice has been paid. Please see attached receipt.

Very truly yours,  
Ina Shtukar Steinberg, Esquire

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[Quoted text hidden]



**BLACK & WHITE LAW, LLP Mail - Transaction receipt.pdf**

80K



Legal Eagle  
PO Box 5682  
Greenville, SC 29606  
864-467-1373  
www.legaleagleinc.com

**BILL TO**

Ina Shtukar-Steinberg  
Black & White Law LLP  
1687 Saybrook Ct.  
Rock Hill, SC 29732

**SHIP TO**

Ina Shtukar-Steinberg  
Black & White Law LLP  
1687 Saybrook Ct.  
Rock Hill, SC 29732

**INVOICE 103896**

**DATE 08/26/2024 TERMS Net 15**

**DUE DATE 09/10/2024**

**PO:**  
Ina Shtukar-Steinberg, Esq.

**CLIENT MATTER:**  
Shtukar v Erie Insurance

| DATE       | QTY | DESCRIPTION                                   | RATE | AMOUNT |
|------------|-----|-----------------------------------------------|------|--------|
| 08/26/2024 |     | Shtukar v Erie Insurance                      |      |        |
| 08/26/2024 | 19  | Standard Delivery Transcription Rate per page | 4.25 | 80.75  |

|                                                                                                            |              |              |
|------------------------------------------------------------------------------------------------------------|--------------|--------------|
| WE APPRECIATE YOUR BUSINESS!                                                                               | SUBTOTAL     | 80.75        |
| Legal Eagle now offers online payment. Go to our website (www.legaleagleinc.com) and click "Pay Invoices". | TAX          | 0.00         |
|                                                                                                            | <b>TOTAL</b> | <b>80.75</b> |

Please keep us in mind for ALL litigation support services:

Court Reporting. E-Discovery. Trial Support.

**TOTAL DUE \$80.75**



Ina S. Steinberg Esq. &lt;ina@blackandwhiteimmigrationlaw.org&gt;

---

**Transaction receipt**

1 message

---

**noreply@legaleagleinc.com** <noreply@legaleagleinc.com>

Tue, Aug 27, 2024 at 5:36 PM

To: "ina@blackandwhiteimmigrationlaw.org" &lt;ina@blackandwhiteimmigrationlaw.org&gt;

**Receipt**

Transaction ID: cr74do70i477g7gicg  
Merchant: LEGAL EAGLE  
Merchant Website:  
Merchant Phone: 864467  
Transaction Date: 08/27/2024 17:36:32 EDT  
Transaction Type: Sale  
Subtotal: \$83.78  
Tax: \$0.00  
Shipping: \$0.00  
Discount: \$3.03  
Amount Authorized: \$80.75  
Amount Captured: \$80.75  
Total: \$80.75

Cash Discount - As an incentive for customers we provide a discount to pay with cash by giving a \$3.03 discount on this transaction.

Pay by Cash and Save! U.S. Patented - US 8131619 B1, US 8478689 B1, US 8423439 B1

PO Number: cr74baf0i474gi8621j0  
Order ID: cr74baf0i474gi8621j0  
Authorization Code: AUTH NUM 683-024  
Status: Pending\_settlement  
Terminal ID:  
Terminal Description:

**Custom Fields**

1. Company Name  
Ina Shtukar Steinberg Esq.

2. Invoice Number(s)  
103896

**Payment Information**

Cardholder Name: Ina Shtukar  
Card Type:  
Payment Type: ach  
Account # \*\*\*\*23\*\*\*\*\*03

**Customer Information****Billing Address**

Ina Shtukar

1687 Saybrook Court  
Rock Hill SC 29732

8/27/24, 5:37 PM

BLACK & WHITE LAW, LLP Mail - Transaction receipt

[ina@blackandwhiteimmigrationlaw.org](mailto:ina@blackandwhiteimmigrationlaw.org)  
(704) 309-0993

**Shipping Address**