

THE CARTER LAW FIRM

105 South Brooks Street
P.O. Box 187
Manning, South Carolina 29102
Tel. (803) 435-0550
Fax (803) 435-0550

Eleazer R. Carter

Reply To:
Manning Office

September 23, 2024

RECEIVED

Sep 23 2024

SC Court of Appeals

Via email: ctappfilings@sccourts.org
The Honorable Jenny A. Kitchings
Clerk of Court S.C. Appeals Court
1220 Senate Street
Columbia, South Carolina 29201

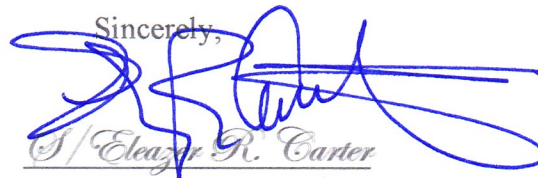
Re Columbia Construction Service, LLC s v. GMK Associate Design-Build
Division, Inc., and Town of Andrews.,
Appellate Case No.: 2024-001370

Dear Ms. Kitchings:

Please find enclosed the Defendant's Town of Andrews **Supplemental Certificate of Mailing** of the September 3, 2024, cover letter and Notice of Motion and Motion to Extend time to Request Transcript. We are also mailing a copy of the original cover-letter dated September 3, 2024, identifying the mailed documents. ***Please notice we are also serving the counsel for the Respondent in this matter as well as the Court Administration.*** Please file and return a clock copy of the same to this Office.

Thank you in advance for your attention to this matter, and if you have any question(s) you should not hesitate to contact the undersigned.

Sincerely,



Eleazer R. Carter

ERC/

Cc: R. Bryan Barnes, Esquire – via Reg Mail & bryan.barnes@rogerstownsand.com
Kristen A. Soucy, Esquire – via Reg Mail & Kristen.soucy@rogerstownsand.com
Court Administration – via regular mail

RECEIVED

Sep 23 2024

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
COURT OF COMMON PLEAS

Appellate Case No.: 2024-001370

Town of Andrews Appellant

v.

GMK Associate Design-Build Division, Inc., and Town of Andrews, ... Respondent

CERTIFICATE OF MAILING

NOW COMES, Eleazer R. Carter, Attorney for the Appellant, Town of Andrews, who hereby certify that a true copies of the Appellant's:

1. Cover letter to SCAC dated September 3, 2024, an additional letter date September 23, 2024, and an email dated September 18, 2024,
2. Notice of Motion and Motion to Extend the time to Request the Transcript of Record dated September 3, 2024.

The same is again, served on opposing counsel on September 23, 2024, as follow:

Robert Bryan Barnes, Esquire
Kristen A. Soucy, Esquire
P. O. Box 100200
Columbia, S. C. 29202

Court Administration
1220 Senate Street
Columbia, South Carolina 29201

September 23, 2024



THE CARTER LAW FIRM

S/ Eleazer R. Carter

Eleazer R. Carter, Esquire
Attorney for the Appellant

Exhibit # 001

Cover Letter to
Robert Bryan Barnes

THE CARTER LAW FIRM

105 South Brooks Street
P.O. Box 187
Manning, South Carolina 29102
Tel. (803) 435-0550
Fax (803) 435-0550

Eleazer R. Carter

Reply To:
Manning Office

September 23, 2024

Bryan.barnes@rogerstownsends.com
Kristen.soucy@rogerstownsends.com

Mr. Robert Bryan Barnes, Esquire
Ms. Kristen A. Soucy, Esquire
1221 Main Street, 14th Floor
Post Office Box 100200
Columbia, South Carolina 29202

RE: Town of Andrews v. GMK Associates
Appellate Case No.: 2024-001370

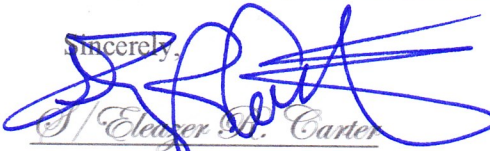
Dear Attorneys Barnes & Soucy:

Pursuant to the South Carolina Court of Appeals' letter dated September 19, 2024, and the SCACR please find enclosed the following documents:

1. Email dated September 3, 2024, to Everyword Inc., requesting a copy of the trial transcript of May 20 and 21, 2024' trial of the above matter;
2. A cover letter dated September 3, 2024, to the SC Court of Appeals, as well as a Notice of Motion and Motion to extend the time to request the transcript of records for the above-referenced trial before the special referee; and lastly
3. Please find a copy of the certificate of mailing of the above to your law office dated September 3, 2024.

As you may recall these documents were also forward to your attention via email dated September 18, 2024, by way of your contact person, Ms. Wendy R. Byars.

Thank you in advance for your attention to this matter, and if you have any questions, you should not hesitate to contact this office.

Sincerely,

Eleazer R. Carter

ERC/
Enclosure(s)

Exhibit # 002

September 3, 2024 Packet of

- a. Cover letter to SCCA
- b. Notice of Motion & Motion to
Extend Time to Request Transcript
- c. Certificate of Service

THE CARTER LAW FIRM

105 South Brooks Street

P.O. Box 187

Manning, South Carolina 29102

Tel. (803) 435-0550

Fax (803) 435-0551

E-mail: eleazercarter@aol.com

Eleazer R. Carter

Reply To:

Manning Office

September 3, 2024

The Honorable Jenny A. Kitchings
Clerk of Court S.C. Appeal
1220 Senate Street
Columbia, South Carolina 29201

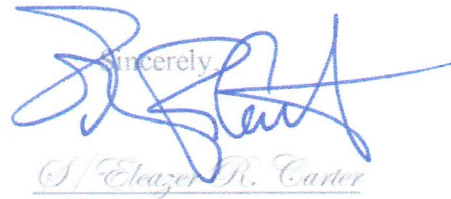
Re Columbia Construction Service, LLC s v. GMK Associate Design-Build
Division, Inc., and Town of Andrews.,
Trial Court Case No.: 2022-CP-22-00663

Dear Ms. Kitchings:

Please find enclosed the Defendant's Town of Andrews **Notice of Motion and Motion to Extend the Time to Request the Transcript of Record by the now Defendant/Appellant. We are also serving the Defendant/Respondent in this matter.** Please file the Notice of Motion and Motion to Extend the Time to Request the Transcript of Record and return a clock copy of the same to this Office. Also, you should be advised that we are forwarding a check in the amount of \$50.00 via regular mail to your attention. Lastly, we are notifying all parties to this filing for their records.

Thank you in advance for your attention to this matter, and if you have any question(s) you should not hesitate to contact the undersigned.

Sincerely,



Eleazer R. Carter
Eleazer R. Carter

ERC/

Cc: R. Bryan Barnes, Esquire – bryan.barnes@rtt-law.com

Thomas A. Russo, Special Referee – tommy@russoresolutions.com

THE STATE OF SOUTH CAROLINA
In the Court of Appeal

APPEAL FROM GEORGETOWN COUNTY
COURT OF COMMON PLEAS

The Honorable Thomas A. Russo,
Special Referee

Case No.: 2022-CP-22-00663

Columbia Construction Service, LLC Plaintiff

v.

GMK Associate Design-Build Division, Inc., and Town of Andrews, ... Defendants

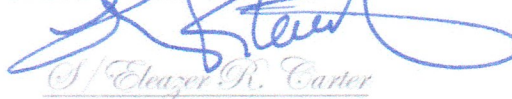
of which

Town of Andrews is the Appellant Against GMK Associate Design-Build Division,
Inc., Respondent.

**NOTICE OF MOTION AND MOTION
TO EXTEND TIME TO
REQUEST TRANSCRIPT OF RECORD**

NOW COMES Eleazer R. Carter, Attorney for the Appellant, Town of Andrews, who now moves the Appellate Court for and Order extending the time to request the transcript of record for the above-captioned matter heard, before the Special Referee. The basis for this motion is the Appellant experienced a problem locating the actual court reporter. The court reporter has been determined and the transcript has now been requested.

THE CARTER LAW FIRM



September 3, 2024

Eleazer R. Carter, Esquire
The Carter Law Firm
105 South Brooks Street
Post Office Box 187
Manning, South Carolina 29102
Phone #: (803) 435-0550
Attorney for the Appellant

THE STATE OF SOUTH CAROLINA
In the Court of Appeal

APPEAL FROM GEORGETOWN COUNTY

COURT OF COMMON PLEAS

The Honorable Thomas A. Russo,
Special Referee

Case No. : 2022-CP-22-00663

Columbia Construction Service, LLC Plaintiff

v.

GMK Associate Design-Build Division, Inc., and Town of Andrews, ... Defendants


of which

Town of Andrews is the Appellant Against GMK Associate Design-Build Division,
Inc., Respondent.

CERTIFICATE OF MAILING

YOU WILL PLEASE TAKE NOTICE, that the undersigned attorney hereby certifies that a true copy of this **Defendant/Appellant's Notice of Motion and Motion to Extend the Time to Request the Transcript of Record** was mailed to the **Defendant/Respondent** by serving the same on the **Counsel for the Defendant/Respondent**, via electronic mail and by depositing the same in the United State Post Office Box(es), proper postage affixed as:

R Bryan Barnes, Esquire
Rogers-Townsend, LLC
Post office Box 100200
Columbia, South Carolina 29202



THE CARTER LAW FIRM
Eleazer R. Carter

Eleazer R. Carter, Esquire
105 South Brooks Street
Post Office Box 187
Manning, South Carolina 29102
Attorney for the Appellant

September 3, 2024

Exhibit # 003

Copy of E-mail sent to Court
Reporter Requesting Transcript

Columbia Construction Service v. GMK and Town of Andrews (Invoice No.: 47486)

From: AOL (eleazercarter@aol.com)

To: production@everywordinc.com

Cc: ctappfilings@sccourts.org

Date: Tuesday, September 3, 2024 at 04:38 PM EDT

Dear Ms. Cindy First:

Please provide the undersigned with a copy of the trial transcript from the trial before Special referee Thomas Russo. We are in need of the same for appeal purposes. also, provide an invoice of the cost for the same.

Thank you in advance for your attention to this matter

Eleazer Carter

(803) 435-0550

Exhibit # 004

Certificate of Mailing
