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Jan 17 2025

SC Court of Appeals

KIG Advocacy, Inc.

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A nonprofit public interest law firm.

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January 17, 2025

VIA E-MAIL ONLY

South Carolina Court of Appeals Clerk
1220 Senate Street
Columbia, SC 29201

RE: Emanuel Stikas, *et al.* v. Georgetown County, *et al.*
Appellate Case No. 2025-000066

Dear Court of Appeals Clerk:

The transcript in this case was obtained prior to filing the Notice of Appeal, and, therefore, Appellants' Initial Brief and Designated Record are currently due on February 10, 2025.

Counsel for Appellants hereby respectfully request a 30-day extension of time within which to file their Initial Brief and Designated Record until March 12, 2025, for the following reasons: I have plans to travel out-of-state during the first ten days of February and both Professor Hubbard and I have other deadlines, scheduling issues and professional obligations between now and the current filing deadline. As a nonprofit organization and *pro bono* legal counsel we have no staff support to assist with drafting and filing.

This is a first extension request in this case. A check for the motion fee will be sent by regular mail.

Thank you for your kind attention and consideration.

Very truly yours,



Cynthia Ranck Person, Esquire
F. Patrick Hubbard, Esquire
ATTORNEYS FOR APPELLANTS

cc: Zachary J. Cowl, Esquire (via email)
Sydney J. Douglas, Esquire (via email)
David B. Miller, Esquire (via email)
H. Thomas Morgan, Jr., Esquire (via email)
Daniel W. Stacy, Jr., Esquire (via email)

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SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM GEORGETOWN COUNTY
Court of Common Pleas

The Honorable David P. Caraker, Jr.
Circuit Court Judge

Appellate Case No. 2025-000066
Circuit Court Case No. 2024 CP 2200577

Emanuel Stikas, Trustee of the Stikas Revocable Living Trust, dated February 1, 2023, d/b/a The Village Shops; Donald W. Reid and Katheryn W. Reid, husband and wife; Elizabeth Gattshall Hawkins Martin; Tall House Farm, L.P.,

Appellants,

v.

Georgetown County; David E. Tanner; RCB Land Holdings, LLC; Magic Oaks, LLC,

Respondents

AND

Magic Oaks, LLC, Third Party Plaintiff

v.

Keep It Green, Inc., Third Party Defendant

TRANSCRIPT REQUEST

In accordance with Rule 207, SCACR, please be advised that the transcript of proceeding in the above matter was previously ordered and received by counsel for Appellants per attached transcript request form and invoice.

/s/ F. Patrick Hubbard
F. Patrick Hubbard (SC Bar #12614)
1525 Senate Street
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Columbia, SC 29208
(803) 422-6762
phubbard@law.sc.edu
ATTORNEY FOR APPELLANTS

/s/ Cynthia Ranck Person
Cynthia Ranck Person (SC Bar #105126)
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kig.advocacy@gmail.com
ATTORNEY FOR APPELLANTS

January 17, 2025



South Carolina Judicial Branch

TRANSCRIPT REQUEST FORM

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SC Court of Appeals

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 Cynthia Person	Law Firm/Agency Keep It Green Advocacy	Phone Number 570-971-8636	
Email Address kig.advocacy@gmail.com		Mailing Address P.O. Box 1922, Pawleys Island, SC 29585	
Is the requestor a party in the case? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If no, does the requestor represent a party? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes, name of party All Plaintiffs			
Transcript Information			
Docket Number 2024 CP 2200577	Full Case Caption (i.e. State v. John Doe or John Smith v. Jane Smith) Emmanuel Stikas, et al., v. Georgetown County, et al.		Circuit <input checked="" type="checkbox"/> Family <input type="checkbox"/>
Date(s) of Proceeding September 19, 2024	County Georgetown	Appeal pending <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Death Penalty <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Presiding Judge Judge Caraker		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) Crowl: zcrowl@bellamylaw.com; Morgan: tommy@smithrobinsonlaw.com		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 checked="" type="checkbox"/> Expedited delivery (7 days) Due on/before: <input type="checkbox"/> Regular delivery (60 days)	
Court Reporter(s) WebEx - No court reporter	<input checked="" type="checkbox"/> WebEx <input type="checkbox"/> DCRP		
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 unknown			

Requestor's Signature: Cynthia R. Person **Date:** September 20, 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.



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BILL TO

Cynthia Person
Keep It Green Advocacy
PO Box 1922
Pawleys Island, SC 29585

INVOICE 104324

DATE 09/30/2024 TERMS Net 15

DUE DATE 10/15/2024

PO:
Cynthia Person, Esq.

CLIENT MATTER:
Stikas v Georgetown County

DATE	QTY DESCRIPTION	RATE	AMOUNT
09/30/2024	Stikas v Georgetown County		
09/30/2024	25 7 Day Expedite of Transcript per page	5.00	125.00
WE APPRECIATE YOUR BUSINESS!		SUBTOTAL	125.00
Legal Eagle now offers online payment. Go to our website (www.legaleagleinc.com) and click "Pay Invoices".		TAX	0.00
		TOTAL	125.00

Please keep us in mind for ALL litigation support services:

Court Reporting. E-Discovery. Trial Support.

TOTAL DUE \$125.00