

David L. Paavola  
Of Counsel  
*Licensed in SC*  
440 Knox Abbott Drive  
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Cayce, SC 29033  
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paavola@conlaw.com

January 28, 2025

**RECEIVED**  
**Jan 28 2025**  
**SC Court of Appeals**

South Carolina Court of Appeals  
Attn.: Jenny Abbott Kitchings, Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 20201  
[ctappfilings@sccourts.org](mailto:ctappfilings@sccourts.org)

RE: Moats Construction, Inc. and Russell Moats v. Anderson County  
Appellate Case No.: 2024-001911

Dear Ms. Kitchings:

Please allow this letter to serve as a status update as requested in your letter dated January 27, 2025 concerning the above matter. A copy of your letter is enclosed for ease of reference.

On November 21, 2024, Counsel for Appellant filed and served three (3) transcript request forms:

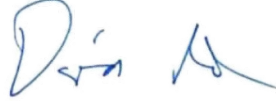
1. Transcript Request Form No. 1 - Requested the trial transcript
2. Transcript Request Form No. 2 - Requested the hearing on the post trial motion for a new trial
3. Transcript Request Form No. 3 - Requested the transcript from the November 7, 2024 motions hearing to be relieved as counsel.

Transcript Request No. 3 has been completed. The Court Reporter responsible for transcribing Transcript No. 1 and Transcript No. 2 required payment upfront before commencing work on those transcripts. I can confirm that the Court Reporter acknowledged receipt of payment from our client on January 23, 2025, and I have attached the email for your reference. It is my understanding that work on these two transcripts is currently underway.

Should I need to take any further action or if you have any questions or require further information, please do not hesitate to reach out.

[Signature page to follow]

With kind regards,



David L. Paavola

DLP/as

Encl.

cc: John Whitfield Davidson, Esq. (via email)  
James Victor McDade, Esq. (via email)  
S.C. Office of Court Administration (via email)  
Lisa M. Scott (via email)



# The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

CATHERINE S. HARRISON  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
[www.sccourts.org](http://www.sccourts.org)

January 27, 2025

Mr. David Lee Paavola, Esquire  
440 Knox Abbott Drive  
Suite 510  
Cayce SC 29033

Re: Moats Construction, Inc. v. Anderson County  
Appellate Case No. 2024-001911

Dear Counsel:

Our records indicate that the transcript in the above matter should have been delivered. As of today's date, we have not received any information indicating that the court reporter has been granted an extension. Further, you have not notified us that you have failed to receive the transcript, nor have we received your initial brief.

If you have not yet received the transcript, Rule 207 of the South Carolina Appellate Court Rules requires you to contact the Office of Court Administration. The address for Court Administration is as follows:

South Carolina Office of Court Administration  
1220 Senate Street, Suite 200  
Columbia, SC 29201  
[transcripts@sccourts.org](mailto:transcripts@sccourts.org)

Be sure to copy the Court and opposing counsel with all correspondence concerning the transcript.

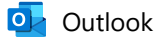
Please advise the Court of the status of the transcript within ten (10) days of the date of this letter, or your appeal will be dismissed.

Very truly yours,

A handwritten signature in blue ink that reads "Catherine Hannisai, deputy". The signature is written in a cursive style with a large initial 'C'.

CLERK

cc: John Whitfield Davidson, Esquire  
James Victor McDade, Esquire



Outlook

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**Re: Transcript Request Forms Re Moats Construction, et al v. Anderson County, et al (C/A No.: 2020-CP-04-00085)**

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**From** Scott, Lisa M. <lscott@sccourts.org>  
**Date** Thu 1/23/2025 3:31 PM  
**To** David Paavola <paavola@conlaw.com>; Angelia Shaw <shaw@conlaw.com>

Mr. Paavola,

I have received the payment in the above-referenced matter. However, normally the checks come from the attorney's office, but this one is from the plaintiff's company account. Normally, I would wait until I've transcribed it in its entirety before cashing the check, but I will go ahead and cash this one to guarantee the funds are available before proceeding with transcribing it.

Thanks,

Lisa M. Scott  
Circuit Court Reporter  
Tenth Judicial Circuit

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**From:** David Paavola <paavola@conlaw.com>  
**Sent:** Thursday, January 9, 2025 12:06 PM  
**To:** Scott, Lisa M. <lscott@sccourts.org>; Angelia Shaw <shaw@conlaw.com>  
**Subject:** Re: Transcript Request Forms Re Moats Construction, et al v. Anderson County, et al (C/A No.: 2020-CP-04-00085)

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

Ms. Scott, the check is on the way. Thanks,

**David L. Paavola**  
Attorney  
KENISON, DUDLEY & CRAWFORD, LLC  
440 Knox Abbott Drive, Suite 510  
Cayce, SC 29033  
Email: [paavola@conlaw.com](mailto:paavola@conlaw.com)  
Main: (864) 242-4899  
Direct: (803) 251-9202  
Website: [www.conlaw.com](http://www.conlaw.com)



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**From:** Scott, Lisa M. <lscott@sccourts.org>  
**Sent:** Tuesday, November 26, 2024 11:22 AM  
**To:** Angelia Shaw <shaw@conlaw.com>  
**Cc:** David Paavola <paavola@conlaw.com>  
**Subject:** Re: Transcript Request Forms Re Moats Construction, et al v. Anderson County, et al (C/A No.: 2020-CP-04-00085)

Ms. Shaw,

I estimate this will be 950 pages and will cost \$4,077.50 to produce. Upon receipt of payment to me at PO Box 4356, Anderson, 29622, I will have 60 days to complete.

Thanks,

Lisa M. Scott  
Circuit Court Reporter  
Tenth Judicial Circuit

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**From:** Angelia Shaw <shaw@conlaw.com>  
**Sent:** Monday, November 25, 2024 10:37 AM  
**To:** Scott, Lisa M. <lscott@sccourts.org>  
**Cc:** David Paavola <paavola@conlaw.com>  
**Subject:** Re: Transcript Request Forms Re Moats Construction, et al v. Anderson County, et al (C/A No.: 2020-CP-04-00085)

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Hi Lisa,

Apologies for just now getting back to you. Mr. Paavola has indicated that we only need the Trial Transcript at this time.

Thank you,



**Angelia Shaw**  
Paralegal  
KENISON, DUDLEY & CRAWFORD, LLC  
440 Knox Abbott Drive, Suite 510  
Cayce, SC 29033  
Email: shaw@conlaw.com  
Main: (864) 242-4899  
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**From:** Scott, Lisa M. <lscott@sccourts.org>  
**Sent:** Thursday, November 21, 2024 4:21 PM  
**To:** Angelia Shaw <shaw@conlaw.com>  
**Subject:** Re: Transcript Request Forms Re Moats Construction, et al v. Anderson County, et al (C/A No.: 2020-CP-04-00085)

Ms. Shaw,

Quick question: Do you want the jury selection or just the trial itself?

Lisa M. Scott  
Circuit Court Reporter  
Tenth Judicial Circuit

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**From:** Angelia Shaw <shaw@conlaw.com>  
**Sent:** Thursday, November 21, 2024 3:32 PM  
**To:** Scott, Lisa M. <lscott@sccourts.org>

**Cc:** David Paavola <paavola@conlaw.com>; j davidson@maynardnexsen.com <j davidson@maynardnexsen.com>; jvmcdade@dotmlaw.com <jvmcdade@dotmlaw.com>

**Subject:** Transcript Request Forms Re Moats Construction, et al v. Anderson County, et al (C/A No.: 2020-CP-04-00085)

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

Dear Ms. Scott,

Attached please find two Transcript Request forms regarding the above-referenced matter.

Sincerely,



**Angelia Shaw**  
Paralegal  
KENISON, DUDLEY & CRAWFORD, LLC  
**440 Knox Abbott Drive, Suite 510**  
**Cayce, SC 29033**  
Email: shaw@conlaw.com  
Main: (864) 242-4899  
Direct: (803) 400-8342  
Website: [www.conlaw.com](http://www.conlaw.com)

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