

**Ballard
Watson Weissenstein**
PERSISTENT. UNWAVERING.

Desa Ballard
Harvey M. Watson III
Stephanie Weissenstein
Attorneys at Law

Post Office Box 6338 | West Columbia, SC 29171
226 State Street | West Columbia, SC 29169 | ph: 803.796.9299 | fx: 803.796.1066 | desaballard.com

Friday, September 27, 2013

RECEIVED

SEP 30 2013

S.C. SUPREME COURT

Via U.S. Mail and Facsimile
Honorable Daniel E. Shearouse
Supreme Court of South Carolina
Post Office Box 11330
Columbia, South Carolina 29211

Re: *Hammer v Hammer; 1634 Main LP v Hammer v Hammer*
Appellate Case No: 2013-001638 and 2013-001652

Dear Mr. Shearouse:

Please find enclosed for filing an original and seven (7) copies of Ms. Hammer's Reply to Return and Supplemental Return of 1634 Main LP to Ms. Hammer's Motion to Dismiss and the related Certificate of Service. Please return a file stamped copy of both the Reply and the Certificate of Service to us in the enclosed self-addressed, stamped envelope.

If you should have any questions, please do not hesitate to contact us. With warm personal regards, I am,

Sincerely yours,

Mara T. Ballard, CFE, CMA
Forensic Accountant
mara@desaballard.com

c: (via US Mail and Email)
Arthur K. Aiken, Esquire
Susan B. Lipscomb, Esquire
Howard Hammer
Shirley Hammer (via Email only)

STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

RECEIVED

SEP 30 2013

S.C. SUPREME COURT

Appeal from Richland County
George C. James Jr., Circuit Court Judge
James F. Barber Jr., Supervising Circuit Court Judge
Case No. 2009-CP-40-05911
Case No. 2010-CP-40-02889

Pending Before the South Carolina Court of Appeals
Appellate Tracking Numbers 2013-001652 and 2013-001638

Howard Hammer, Appellant

Vs.

Shirley Hammer, Respondent

1634 Main LP, Appellant

Vs.

Shirley Hammer, Respondent

Vs.

Howard Hammer,
Appellant.

**REPLY TO RETURN AND SUPPLEMENTAL RETURN OF 1634 MAIN, LP
TO
MOTION TO DISMISS OF SHIRLEY HAMMER**

1634 Main, LP has filed a return with exhibits and an amended return, both of which indicate that the relief requested by respondent Shirley Hammer is appropriate. The filings of 1634 Main LP confirm that 1634 Main LP is just now getting around to making financial arrangements for payment of the transcript of the trial proceedings held in this matter in October, 2012 (and one hearing in

January, 2013), despite final orders for the transcripts being required in July, 2013. 1634 Main, LP made little, if any, efforts to arrange for the purchase of the trial transcript until Mrs. Hammer moved for dismissal of the appeals.

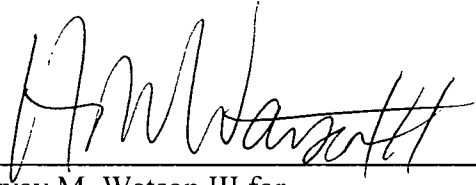
Howard Hammer has not responded to the motion to dismiss nor has he indicated any effort to comply with the July deadline for making appropriate financial arrangements for purchase of the transcript.

By order dated September 18, 2013, this Court expedited all appeals. By delaying (or not complying at all) with mandates to obtain the trial transcript, appellants have made clear their intent to delay these proceedings. It will be very difficult to expedite these appeals if the transcripts have yet to be properly ordered and paid for.

We are enclosing as exhibits to our motion all copies of court reporter communications we have received in regards to the trial proceedings transcripts (except for the transcript from Crystal Holmes, who appears to have already provided the transcript) so the Court has all available information. If there is additional communication with Ms. Ambroziak or Ms. Gordon, we were not copied on it.

For the reasons set forth above, Mrs. Hammer moves to dismiss these appeals with prejudice.

[signature next page]



Harvey M. Watson III for
Desa Ballard
Stephanie Weissenstein

Ballard Watson Weissenstein
Post Office Box 6338
West Columbia, SC 29171
Telephone 803.796.9299
Facsimile 803.796.1066
Email: desab@desaballard.com
stephanie@desaballard.com

ATTORNEYS FOR SHIRLEY HAMMER

September 27, 2013

AIKEN & HIGHTOWER, PA

Attorneys at Law
2231 Devine Street, Suite 201
Columbia, SC 29205
Phone: 803-799-5205
Fax: 803-799-5206

Arthur K. Aiken

A. Bea Hightower

July 17, 2013

Karen Ambroziak
1083 Langford Road
Blythewood, SC 29016

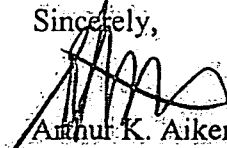
Re: Howard Hammer v Shirley Hammer
Circuit Court Case No. 2009-CP-40-05911

Dear Ms. Ambroziak:

You reported a trial (October 29 and 30, 2012) and a hearing (January 15, 2013) presided over by Judge George C. James in the above case. Please deliver a transcript of these proceedings to me.

I will either prepay for the estimated costs or pay for the transcript over an invoice as you choose.

Thank you for your help.

Sincerely,

Arthur K. Aiken
art@aikenandhightower.com

Cc: Desa Ballard
The South Carolina Court of Appeals
South Carolina Court Administration

AIKEN & HIGHTOWER, PA

Attorneys at Law
2231 Devine Street, Suite 201
Columbia, SC 29205
Phone: 803-799-5205
Fax: 803-799-5206

Arthur K. Aiken

A. Bea Hightower

July 17, 2013

Hattie O. Gordon
PO Box 597
Wallace, SC 29596-0597

Re: Howard Hammer v Shirley Hammer
Circuit Court Case No.: 2009-CP-40-05911

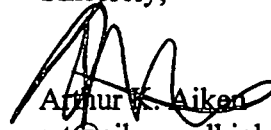
Dear Ms. Gordon:

You reported a hearing (May 17, 2013) presided over by Judge George C. James in the above case. Please deliver a transcript of these proceedings to me.

I will either prepay for the estimated costs or pay for the transcript over an invoice as you choose.

Thank you for your help.

Sincerely,



Arthur K. Aiken
art@aikenandhightower.com

Cc: Desa Ballard
The South Carolina Court of Appeals
South Carolina Court Administration

1634 Main St., Suite 200
Columbia, SC 29201

LIPSCOMB LAW FIRM, PA
Attorneys at Law

Tel.: (803) 233-6654
Fax: (803) 233-6663

Susan Batten Lipscomb
Susan@LLFSC.com

John Richard Lipscomb
John@LLFSC.com

Kelsey Katrina Lipscomb
Kelsey@LLFSC.com

July 25, 2013

Karen Ambroziak
1083 Langford Rd.
Blythewood, SC 29016

Re: 1634 Main, LLP v. Shirley Hammer
Civil Action #: 2010-CP-40-2889

Dear Ms. Ambroziak:

The referenced matter was before the Honorable George C. James for trial on October 29 and 30, 2012, and was before him for a hearing on January 15, 2013 for which you were the court reporter.

Please provide me with a copy of the transcript of the trial on October 29 and 30, 2012 and a copy of the transcript of the January 15, 2013, hearing. I will either prepay for the estimated cost or pay for the transcript on receipt of an invoice as you direct.

Thank you for your assistance in this regard.

Yours very truly,



Susan Batten Lipscomb

cc: Desa Ballard, Esquire
Stephanie Weissenstein, Esquire
The South Carolina Court of Appeals
South Carolina Court Administration
Howard Hammer

1634 Main St., Suite 200
Columbia, SC 29201

LIPSCOMB LAW FIRM, P.A.
Attorneys at Law

Tel.: (803) 233-6654
Fax: (803) 233-6663

Susan Batten Lipscomb
Susan@LLFSC.com

John Richard Lipscomb
John@LLFSC.com

Kelsey Katrina Lipscomb
Kelsey@LLFSC.com

July 25, 2013

Hattie O. Gordon
Post Office Box 597
Wallace, SC 29596-0597

Re: 1634 Main, LLP v. Shirley Hammer
Civil Action #: 2010-CP-40-2889

Dear Ms. Gordon:

The referenced matter was before the Honorable George C. James for a hearing on May 17, 2013, for which you were the court reporter.

Please provide me with a copy of the transcript of the May 17, 2013, hearing. I will either prepay for the estimated cost or pay for the transcript on receipt of an invoice as you direct.

Thank you for your assistance in this regard.

Yours very truly,



Susan Batten Lipscomb

cc: Desa Ballard, Esquire
Stephanie Weissenstein, Esquire
The South Carolina Court of Appeals
South Carolina Court Administration
Howard Hammer

TELEPHONE
803.530.8517

HOWARD HAMMER
1609 Catawba Street
Columbia, South Carolina 29205

FACSIMILE
803.799.9202

August 9, 2013

Karen Ambroziak
1083 Langford Road
Blythewood, South Carolina 29016

Re: Shirley Hammer, Respondent/Defendant vs.
Howard Hammer, Appellant/Additional Defendant on Counterclaim
Civil Action #: 2010-CP-40-2889

Dear Ms. Ambroziak:

This is to request a copy of the pertinent parts of the transcript of the consolidated trials of October 29 and 30, 2012, solely that relate to the Counterclaim of Shirley Hammer, Respondent/Defendant vs. Howard Hammer, Appellant/Additional Defendant on Counterclaim.

Although three actions were consolidated, they were tried separately and accordingly I wish to clarify that I am only asking for that portion of the record, including any Motions that relate to the case against me above captioned. I call attention that at the beginning of the case the Honorable George C. James, Trial Judge, began with comments after which Ms. Hammer's attorney made Motions and withdrawal of certain parts of the claim against me. I particularly wish to have all of that portion of the transcript, with all of the trial testimony as set forth above, and of course all Motions by opposing counsel and by me, along with transcript of all rulings solely in the captioned matter. I call attention in regard to the Motions that some of my Motions may have been adoptions of Motions by other counsel and accordingly I would need those included.

I also request copy of the Transcript of January 15, 2013, again limited to the matters pertaining to the case of Shirley Hammer, Respondent/Defendant vs. Howard Hammer, Appellant/Additional Defendant on Counterclaim.

Very truly yours,



Howard Hammer

cc: Desa Ballard, Attorney at Law
The South Carolina Court of Appeals
South Carolina Court Administration
Susan Lipscomb, Attorney at Law

TELEPHONE
803.530.8517

HOWARD HAMMER
1609 Catawba Street
Columbia, South Carolina 29205

FACSIMILE
803.799.9202

August 9, 2013

Hattie O. Gordon
Post Office Box 597
Wallace, South Carolina 29596-0597

Re: Shirley Hammer, Respondent/Defendant vs.
Howard Hammer, Appellant/Additional Defendant on Counterclaim
Civil Action #: 2010-CP-40-2889

Dear Ms. Gordon:

The referenced matter was before the Honorable George C. James for a hearing on May 17, 2013, for which you were the court reporter.

Please provide me with a copy of the transcript of the May 17, 2013, hearing. I will either prepay for the estimated cost or pay for the transcript on receipt of an invoice as you direct.

Thank you for your assistance in this matter.

Very truly yours,



Howard Hammer

cc: Desa Ballard, Attorney at Law
The South Carolina Court of Appeals
South Carolina Court Administration
Susan Lipscomb, Attorney at Law

-----Original Message-----

From: Ambroziak, Karen [<mailto:kambroziak@sccourts.org>]
Sent: Monday, September 23, 2013 1:08 PM
To: Desa Ballard
Subject: FW: transcript request letter - Hammer vs Hammer

This is the communication I had with Mr. Hammer that I forwarded to both Ms. Lipscomb and Mr. Aiken so everyone on that side was involved in the communication regarding who is requesting the transcript and who is paying for the transcript.

Karen Ambroziak, RPR
Court Reporter for the Honorable Robert E. Hood _____
From: Ambroziak, Karen
Sent: Monday, August 19, 2013 3:45 PM
To: SBL@lipscomblawfirm.com
Cc: art@aikenandhightower.com
Subject: FW: transcript request letter - Hammer vs Hammer

Due to the judicial email address book, I was unable to copy both of you on the letter I sent Mr. Hammer, so I will forward to you.

Karen Ambroziak, RPR
Court Reporter for the Honorable Robert E. Hood _____
From: Ambroziak, Karen
Sent: Monday, August 19, 2013 3:43 PM
To: howham1945@gmail.com
Subject: transcript request letter - Hammer vs Hammer

Mr. Hammer,

I have received your letter requesting, as I understand it, "pertinent parts of the transcript of the consolidated trials of October 29 and 30, 2012 solely that relate to the counterclaim of Shirley Hammer; portions of the record including any motions that relate to the case against you from the beginning where the judge began with comments after Ms. Hammer's attorney made motions and withdrawal of certain parts of the claim against you, particularly all of that portion with all the trial testimony as set forth above, motions by opposing counsel and by you, along with rulings solely in the captioned matter, calling attention in regard to motions that some of your motions may have been adoptions of motions by other counsel; the transcript of January 15, 2013 limited to matters pertaining to the case of Shirley Hammer, Respondent/Defendant vs Howard Hammer, Appellant/Additional Defendant on counterclaim."

Per the South Carolina Court Reporter Manual, Section XIV A. "Attorneys may order any portion of a transcript which they desire but the court reporter will not be required to transcribe with greater specificity than the following examples: voir dire by juror; jury selection; plaintiff's or defendant's opening statements or closing arguments; the entire direct, cross, redirect or recross examination of a particular witness by a particular attorney or the ruling of the court." If you would like to narrow your request within these parameters or request the entire transcript, you may do so.

I have also received request letters from Ms. Lipscomb and Mr. Aiken for the same hearing dates. It was my understanding they were representing you in some areas individually and some through 1634 Main, LLP. I am seeking clarification in this regard so I know how to estimate the preparation cost for the transcripts. I am unsure whether all three of you are requesting the transcript or if these letters are a duplicate request from attorneys representing the same party.

Karen Ambroziak, RPR
Court Reporter for the Honorable Robert E. Hood

From: [Ambroziak, Karen](#)
To: [Desa Ballard](#)
Subject: FW: 1634 Main vs Hammer transcript question
Date: Monday, September 23, 2013 1:02:42 PM

Ms. Ballard,

Per your request after speaking with my supervisor, Ms. Allen, attached is the communication regarding the transcript request I had with Ms. Lipscomb. I did not know who would be responsible for payment of the transcript, and then I became confused by receiving requests for the transcript from Mr. Aiken, Ms. Lipscomb and Mr. Hammer. I didn't think they were requesting an original and two copies. I still am confused, and the matter was never clarified, nor payment received.

Karen Ambroziak, RPR
Court Reporter for the Honorable Robert E. Hood

From: Ambroziak, Karen
Sent: Wednesday, August 14, 2013 5:58 PM
To: Susan Lipscomb
Subject: RE: 1634 Main vs Hammer transcript question

Hi Ms. Lipscomb,

I know I said I'd leave you alone until at least Friday, but I'm confused by the requests I have received for this transcript.

I have received a request for this transcript from you, from Mr. Aiken, and parts and sub-parts with specificity greater than I am able to furnish without having a law degree and/or required by the South Carolina Court Reporter Manual published by Court Administration to provide from Mr. Hammer.

It was my understanding that in a way, both you and Mr. Aiken represented Mr. Hammer directly and indirectly with him listed as a party in the Hammer vs. Hammer case and also 1634 Main. As much as I would love to sell all of you copies of transcripts in this case, I am confused as to who is requesting the transcript. Are you still requesting the transcript, or have the two subsequent requests come in place of your original request?

Sorry to bother you. I just need to know who is requesting the transcript so I know who to respond and who to respond to.

Thank you.

Karen Ambroziak, RPR
Court Reporter for the Honorable Robert E. Hood

From: Susan Lipscomb [SBL@lipscomblawfirm.com]
Sent: Friday, August 09, 2013 3:29 PM
To: Ambroziak, Karen
Subject: RE: 1634 Main vs Hammer transcript question

I have to check this out. I have been tied up with what was supposed to be a 2 week trial starting Sept. 3, which I think we just settled. I promise to get back to you Monday. OK?

Susan Batten Lipscomb
LIPSCOMB LAW FIRM, P.A.
1634 Main St., Suite 200
Columbia, South Carolina 29201

Telephone Office: (803) 233-6654
Facsimile Number: (803) 233-6663
<http://www.LipscombLawFirmSC.com>

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If you have received this e-mail message in error, please notify me immediately by telephone number or e-mail and return the original message to me or destroy all printed and electronic copies.
Thank you for your cooperation.

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-----Original Message-----

From: Ambroziak, Karen [<mailto:kambroziak@sccourts.org>]
Sent: Friday, August 09, 2013 3:24 PM
To: Susan Lipscomb
Subject: RE: 1634 Main vs Hammer transcript question

Is Mr. Aiken now taking over the request, or are you still waiting to find out payment arrangements?
Please let me know so I know what to do with your request.

Thank you.

Karen Ambroziak, RPR
Court Reporter for the Honorable Robert E. Hood

From: Susan Lipscomb [SBL@lipscomblawfirm.com]
Sent: Sunday, August 04, 2013 12:18 PM
To: Ambroziak, Karen
Subject: RE: 1634 Main vs Hammer transcript question

I will let you know this week.

Susan Batten Lipscomb
LIPSCOMB LAW FIRM, P.A.
1634 Main St., Suite 200
Columbia, South Carolina 29201
Telephone Office: (803) 233-6654
Facsimile Number: (803) 233-6663
<http://www.LipscombLawFirmSC.com>

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Thank you for your cooperation.

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-----Original Message-----

From: Ambroziak, Karen [<mailto:kambroziak@sccourts.org>]
Sent: Friday, August 02, 2013 10:16 AM
To: susan@lfsc.com
Subject: 1634 Main vs Hammer transcript question

Ms. Lipscomb,

I received your letter requesting the above-referenced transcript of record. Regarding payment of the invoice, will Mr. Hammer be paying the transcription fees or will you directly?

Thank you,

Karen Ambroziak, RPR
Court Reporter for the Honorable Robert E. Hood

From: [Ambroziak, Karen](#)
To: [Desa Ballard](#)
Cc: [Stephanie Weissenstein](#); [Mara Ballard](#); [Malory Hogg](#); [Terrie Stafford](#)
Subject: RE: Hammer v Hammer
Date: Thursday, August 22, 2013 9:35:53 AM

I will not consider the request complete until I receive payment in advance. If payment is received, I will be sure to let you know.

Karen Ambroziak, RPR
Court Reporter for the Honorable Robert E. Hood

From: Desa Ballard [desab@desaballard.com]
Sent: Wednesday, August 21, 2013 10:55 PM
To: Ambroziak, Karen
Cc: Stephanie Weissenstein; Mara@desaballard.com; Malory Hogg; Terrie Stafford
Subject: RE: Hammer v Hammer

Thank you so much. I have written all 3 court reporters from whom he has requested transcripts, and I suspect payment will be a stumbling block on each. I need to keep the appellate courts informed.

I'll look forward to receiving updates.

Thanks again -

db

Desa Ballard
Ballard Watson Weissenstein
Telephone 803.796.9299
Facsimile 803.796.1066
E-mail: desab@desaballard.com, copy to terrie@desaballard.com

-----Original Message-----

From: Ambroziak, Karen [<mailto:kambroziak@sccourts.org>]
Sent: Wednesday, August 21, 2013 7:29 PM
To: Desa Ballard
Subject: Hammer v Hammer

Hi Ms. Ballard,

I wanted to let you know I received your letter. As of right now, I have received requests for this transcript from Ms. Lipscomb, Mr. Aiken, and Mr. Hammer. I emailed Ms. Lipscomb several times, and we discussed payment arrangements. I also asked whether the three parties were each requesting copies. I did not receive a response to that question. Mr. Hammer's request, as written, cannot be complied with as it goes outside the parameters of the South Carolina Court Reporter manual.

At this point, I do not consider it an official request because satisfactory payment arrangements have not been made. I will let you know if the transcript is officially requested.

Karen Ambroziak, RPR

Court Reporter for the Honorable Robert E. Hood

1634 Main St., Suite 200
Columbia, SC 29201

LIPSCOMB LAW FIRM, PA
Attorneys at Law

Tel.: (803) 233-6654
Fax: (803) 233-6663

Susan Batten Lipscomb
Susan@LLFSC.com

John Richard Lipscomb
John@LLFSC.com

Kelsey Katrina Lipscomb
Kelsey@LLFSC.com

September 23, 2013

Karen Ambroziak
1083 Langford Rd.
Blythewood, SC 29016

Re: 1634 Main, LLP v. Shirley Hammer v. Howard Hammer.
Civil Action #: 2010-CP-40-2889

Dear Ms. Ambroziak:

The referenced matter was before the Honorable George C. James for trial on October 29 and 30, 2012, and was before him for a hearing on January 15, 2013, for which you were the court reporter.

In accord with our prior conversation and enclosed letter of July 25, 2013, we are requesting the transcript for the trial in 1634 Main, L.P. v. Shirley Hammer Civil Action No. 2010-CP-40-2889, on October 29 and 30, 2013. The first case tried was Hammer v. Hammer, which was tried by Mr. Art Aiken. I am not requesting that transcript, just the record until Mr. Aiken started that trial, and then all of the trial in the 1634 Main, L.P. case. Also I need the transcript of the January 15, 2013, hearing.

1634 Main, L.P. will pay the costs of the transcripts, but I will guarantee the timely payment to you or get you an advance of the amount you estimate to be the costs. Please let me know. If you have any questions, please give me a call.

Thank you for your assistance in this regard.

Yours very truly,



Susan Batten Lipscomb

Enclosure

cc: Desa Ballard, Esquire ✓
Stephanie Weissenstein, Esquire ✓
The South Carolina Court of Appeals
South Carolina Court Administration
Howard Hammer

1634 Main St., Suite 200
Columbia, SC 29201

LIPSCOMB LAW FIRM, PA
Attorneys at Law

Tel.: (803) 233-6654
Fax: (803) 233-6663

Susan Batten Lipscomb
Susan@LLFSC.com

John Richard Lipscomb
John@LLFSC.com

Kelsey Katrina Lipscomb
Kelsey@LLFSC.com

September 23, 2013

Hattie O. Gordon
Post Office Box 597
Wallace, SC 29596-0597

Re: 1634 Main, LLP v. Shirley Hammer
Civil Action #: 2010-CP-40-2889

Dear Ms. Gordon:

The referenced matter was before the Honorable George C. James for a hearing on May 17, 2013, for which you were the court reporter. Please see the attached letter dated July 25, 2013, in which I proposed payment arrangements for the transcript. If you have transcribed the hearing, please send me an invoice and we will promptly pay it. If you have not yet transcribed the hearing, we request that you do so, and as previously stated I will either prepay for the estimated cost or pay for the transcript on receipt of an invoice as you direct. I look forward to hearing from you soon.

Thank you for your assistance in this regard.

Yours very truly,



Susan Batten Lipscomb

Enclosure

cc: Desa Ballard, Esquire ✓
Stephanie Weissenstein, Esquire ✓
The South Carolina Court of Appeals
South Carolina Court Administration
Howard Hammer

1634 Main St., Suite 200
Columbia, SC 29201

LIPSCOMB LAW FIRM, PA

Attorneys at Law

Tel.: (803) 233-6654
Fax: (803) 233-6663

Susan Batten Lipscomb
Susan@LLFSC.com

John Richard Lipscomb
John@LLFSC.com

Kelsey Katrina Lipscomb
Kelsey@LLFSC.com

September 23, 2013

Crystal M. Holmes
Post Office Box 611
Columbia, SC 29202

Re: 1634 Main, LLP v. Shirley Hammer
Civil Action #: 2010-CP-40-2889

Dear Ms. Holmes:

The above-referenced matter was before the Honorable George C. James on a hearing on May 1, 2013, for which you were the court reporter. Please see the attached letter dated July 25, 2013, in which I proposed payment arrangements for the transcript. Again, I will either pre-pay for the estimated cost or pay for the transcript upon receipt of an invoice. I look forward to hearing from you soon.

Thank you for your assistance in this regard.

Yours very truly,



Susan Batten Lipscomb

Enclosure

cc: Desa Ballard, Esquire ✓
Stephanie Weissenstein, Esquire ✓
The South Carolina Court of Appeals
South Carolina Court Administration
Howard Hammer

-----Original Message-----

From: Susan Lipscomb [mailto:lipscomblaw@gmail.com]
Sent: Wednesday, September 25, 2013 3:35 PM
To: 'Ambroziak, Karen'
Subject: RE: transcript request letter - Hammer vs Hammer

I would need from the first word on the record until Art Aiken called his first witness.

I am pretty sure that the 1634 trial began on October 30, 2013, and I would need from there to the end.

Does that help?

Susan

Susan Batten Lipscomb
LIPSCOMB LAW FIRM, P.A.
1634 Main St., Suite 200
Columbia, South Carolina 29201
Telephone Office: (803) 233-6654
Facsimile Number: (803) 233-6663
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STATE OF SOUTH CAROLINA
IN THE SUPREME COURT

Appeal from Richland County
George C. James Jr., Circuit Court Judge
James F. Barber Jr., Supervising Circuit Court Judge
Case No. 2009-CP-40-05911
Case No. 2010-CP-40-02889

Pending Before the South Carolina Court of Appeals
Appellate Tracking Numbers 2013-001652 and 2013-001638

Howard Hammer, Appellant

Vs.

Shirley Hammer, Respondent

1634 Main LP, Appellant

Vs.

Shirley Hammer, Respondent

Vs.

Howard Hammer,

Appellant.

CERTIFICATE OF SERVICE

I, Mara T. Ballard, an employee of Desa Ballard, PA d/b/a Ballard Watson Weissenstein, do hereby certify that on September 27, 2013, that I served a copy of the Respondent's Reply to Return and Supplemental Return of 1634 Main, LP to Motion to Dismiss of Shirley Hammer on counsel of record and *Pro-Se* parties by placing the referenced document in the United States mail with sufficient first class postage to the following addresses:

Arthur K. Aiken Esquire
Aiken & Hightower
2231 Devine St.
Ste. 201
Columbia South Carolina 29205

Susan Batten Lipscomb
Lipscomb Law Firm, PA
1634 Main Street, Suite 200
Columbia South Carolina 29201

Howard Hammer
1609 Catawba Street
Columbia South Carolina 29205


Mara T. Ballard, CMA, CFE, FA

September 27, 2013