

David L. Paavola
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April 29, 2025

South Carolina Court of Appeals
Attn.: Jenny Abbott Kitchings, Clerk of Court
1220 Senate Street, Suite 200
Columbia, South Carolina 20201
ctappfilings@sccourts.org; transcripts@sccourts.org

RECEIVED
Apr 29 2025
SC Court of Appeals

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

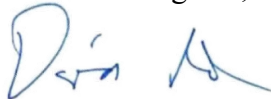
Dear Ms. Kitchings:

Please allow this letter to serve as a status update regarding the above matter, as requested in your letter dated April 28, 2025. For your convenience, I have enclosed a copy of your letter.

On March 14, 2025, Lisa Scott, the Court Reporter responsible for transcribing the trial transcript, notified us by email that she had submitted a Notice of Request for Extension. In her request, she cited the need for additional time due to other transcripts that had been ordered expedited as well as a civil trial transcript that had been ordered the same day. Ms. Scott indicated on the form that the estimated date of completion for this trial transcript to be May 21, 2025; I am enclosing this email and extension request for your reference. We have not heard from Ms. Scott since this email.

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.

With kind regards,



David L. Paavola

DLP/as

Transcript Status Letter

April 29, 2025

Page 2

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

April 28, 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

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 Hannissai, deputy". The signature is written in a cursive style with a large initial 'C'.

CLERK

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




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

From Scott, Lisa M. <lscott@sccourts.org>

Date Fri 3/14/2025 9:50 AM

To David Paavola <paavola@conlaw.com>; Angelia Shaw <shaw@conlaw.com>

 2 attachments (2 MB)

072224 Russell Moats v. Anderson County 2020-CP-04-00085.pdf; Moats Construction v. Anderson County 2020-CP-04-00085.jpg;

Please see attached completed transcript for date of service 7/22/24, the post-trial motions. Also, I have had to request an extension for the trial transcript due to having several other trial transcripts ordering at the same time as yours.

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

Main: (864) 242-4899

Direct: (803) 251-9202

Website: 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

Direct: (803) 400-8342

Website: www.conlaw.com

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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

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 <jdavidson@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

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NOTICE OF REQUEST FOR EXTENSION

TITLE OF CASE ( Russell Moats, ( PLAINTIFF, ( 2020-CP-04-00085 ( Case No. ( -VS- ( Anderson County, ( DEFENDANT. (

In accordance with Section 2D of Rule 1 of the Supreme Court Rules of Practice, an extension for completion of the transcript of proceedings in the above-entitled action is requested.

Date Transcript was Ordered: 1/21/25

Attorneys involved in the appeal: For Appellant: Thomas Goodwyn

CASE NOT ON APPEAL  James McDade  
 Approved \_\_\_\_\_ John Davidson  
 Not Approved \_\_\_\_\_

For Respondent: \_\_\_\_\_

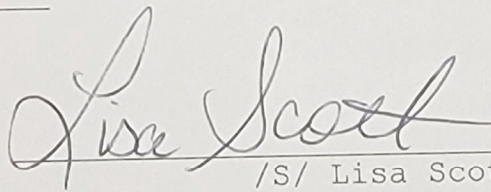
Approximate Number of Pages: 950

Pages completed to date: 0

Estimated completion date: 05/21/2025

Reason for Extension: Need additional time due to other transcripts ordered expedited, as well as another civil trial that ordered the same day.

Date Submitted: 03/14/2025

BY:  \_\_\_\_\_  
 /S/ Lisa Scott  
 Official Court Reporter

cc: Attorney for Appellant  
Attorney for Respondent