

T. Jeff Goodwyn, Jr.*†
Jefferson D. Turnipseed**

GOODWYN LAW FIRM, LLC

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*Also Licensed in Georgia
† Certified Circuit Court Mediator
** Of Counsel

July 21, 2025

RECEIVED

Jul 21 2025

SC Court of Appeals

VIA E-FILING

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate Street
Columbia, SC 29201

Re: *Palmetto Contract Services, Inc. v Zurich American Insurance Company of Illionis*
Case No.: 2015-CP-10-06684
Appellate Case No.: 2025-001339
Our File No.: 3000-00691

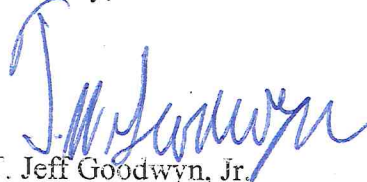
Dear Ms. Kitchings:

Per the Court's July 17, 2025 correspondence regarding the overdue hearing transcript, please be advised the hearing transcript was requested on July 2, 2025, see attached email, and a response was received from Tamme Holmes on July 11, 2025, while I was out on vacation, that their division does not maintain Judge Scarborough's hearing transcripts and that I would need to contact his chambers. Please see the attached correspondence to Judge Scarborough being sent out today requesting the transcript from his chambers.

As evidenced in the Proof of Service, I have served all interested parties, with a copy of this correspondence.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: The Honorable Mikeli Scarborough (via facsimile)
Carolyn H. Blue, Esquire (via email)
Larry D. Cohen, Esquire (via email)

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Jul 21 2025

SC Court of Appeals

IN THE STATE OF SOUTH CAROLINA
In the Circuit Court

APPEAL FROM CHARLESTON CIRCUIT COURT

Mikell Scarborough, Circuit Court Judge

Circuit Court Case No.: 2015-CP-10-06684
Appellate Case No.: Pending

Palmetto Contract Services, Inc.Appellant,

v.

Zurich American Insurance Company of Illinois
.....Respondent.

PROOF OF SERVICE

I certify that I have served a copy of **CORRESPONDENCE** on the following via email address and facsimile on July 21, 2025.

Larry D. Cohen, Esquire Larry D. Cohen, LLC ldcohen@ldcohenlaw.com	Hon. Mikell R. Scarborough Charleston County Common Pleas (843) 958-5077 Facsimile
Carolyn H. Blue, Esquire carolyn.blue@ymail.com	

GOODWYN LAW FIRM, LLC



T. Jeff Goodwyn, Jr. (73789)
Attorney for Appellant

cchase goodwynlaw.com

From: Holmes, Tammie <tholmes@sccourts.org>
Sent: Friday, July 11, 2025 12:06 AM
To: cchase goodwynlaw.com; Transcripts
Cc: jgoodwyn goodwynlaw.com; Carolyn Blue; ldcohen@ldcohenlaw.com
Subject: RE: REQUEST FOR TRANSCRIPT - Zurich American Insurance Company of Illinois v Palmetto Contract Services, Inc.

Good afternoon.

You will need to contact Judge Scarborough's office to obtain this transcript. We do not process Magistrate Court transcripts through my office. Magistrate Court keeps their own hearing recordings.

Thank you,

From: cchase goodwynlaw.com <cchase@goodwynlaw.com>
Sent: Wednesday, July 2, 2025 1:49 PM
To: Transcripts <transcripts@sccourts.org>
Cc: jgoodwyn goodwynlaw.com <jgoodwyn@goodwynlaw.com>; Carolyn Blue <carolyn.blue@ymail.com>; ldcohen@ldcohenlaw.com
Subject: REQUEST FOR TRANSCRIPT - Zurich American Insurance Company of Illinois v Palmetto Contract Services, Inc.

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

Good afternoon –

Attached please find the executed Transcript Request Form in connection with the above-referenced matter.

Please confirm receipt and should you have any questions, please let me know.

Thank you.

Ms. Cesairé Nicole Chase, Legal Assistant
Goodwyn Law Firm, LLC
2309 Devine Street
Columbia, SC 29205
(803) 251-4517
(803) 251-4527 facsimile
cchase@goodwynlaw.com

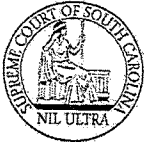
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Jul 21 2025

SC Court of Appeals



South Carolina Judicial Branch
TRANSCRIPT REQUEST FORM

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 (T. Jeff Goodwyn, Jr.), Law Firm/Agency (Goodwyn Law Firm, LLC), Phone Number (803-251-4517), Email Address (jgoodwyn@goodwynlaw.com), Mailing Address (2309 Devine Street, Columbia, SC 29205). Transcript Information: Docket Number (2015-CP-10-06684), Full Case Caption (Zurich American Insurance Company of Illinois v Palmetto Contract Services, Inc.), Circuit (checked), Family (unchecked), Date(s) of Proceeding (June 20, 2025), County (Charleston), Appeal pending (checked), Death Penalty (unchecked). Presiding Judge (Mikell Scarborough). Special Circumstances (unchecked). Delivery Timeframe (checked for Regular delivery (60 days)). Delivery Method (checked for PDF / Email). Responsible Payor (checked for Private / Self). Portion of proceeding to be transcribed (checked for Entire hearing). Next Hearing Date.

Requestor's Signature: [Handwritten Signature] Date: 7/21/25

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.

T. Jeff Goodwyn, Jr. \*†  
Jefferson D. Turnipseed\*\*

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**Jul 21 2025**

**SC Court of Appeals**

July 21, 2025

**VIA FACSIMILE**

The Hon. Mikell R. Scarborough  
100 Broad St Ste 266  
Charleston, SC 29401-2243  
(843) 958-5077

Re: **HEARING TRANSCRIPT REQUEST– JUNE 20, 2025**  
***Zurich American Ins. Co. of Illinois v. Palmetto Contract Services, LLC***  
*Case No.: 2015-CP-10-06684*  
*Appellate Case No.: 2025-001339*  
*Our File No.: 3000-0691*

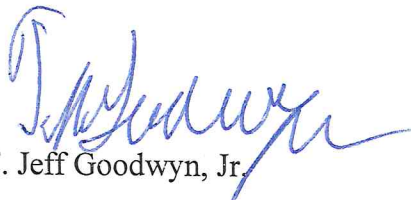
Dear Judge Scarborough:

I represent Defendant/Appellant Palmetto Contract Services, LLC and am seeking the hearing transcript from the June 20, 2025 hearing held before you in connection with the above-referenced matter.

It is my understanding after submitting a hearing transcript form that the “Transcripts Division” does not maintain the transcripts for your chambers and that I would need to contact you to request the transcript (see attached email).

Please advise on the process for requesting a hearing transcript from your chambers and should you have any questions, please contact my office at 803-251-4517.

Sincerely,



T. Jeff Goodwyn, Jr.

TJG:cnc

Enclosures

cc: Larry D. Cohen, Esquire  
Carolyn H. Blue, Esquire  
(all via email)