

# Coggin Law Office

P.O. Box 7092  
Hilton Head, SC 29938  
Phone: 843-689-7777  
Fax: 843-689-7779  
Email: gcitylaw@aol.com

RECEIVED

APR 29 2014

SC Court of Appeals

April 26, 2014

V. Claire Allen  
Deputy Clerk of South Carolina Court of Appeals  
1015 Sumter Street  
Suite 200  
Columbia, SC 29201

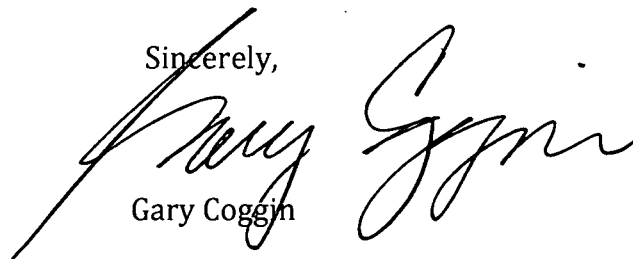
Re: Mary Ellen Valent v. Celeste Nicole Delaplane  
Appellate Case No. 2013-002584

Dear Ms. Allen:

Per your letter of April 21, 2014, advising me of certain deficiencies in transcript-related document that I had sent the Appellate Court in March, 2014, please find enclosed copies of all that was sent to opposing counsel and to the Office of Court Administration.

Thank you for your help in this matter. Please contact me if you have any questions or concerns.

Sincerely,



Gary Coggin

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April 26, 2014

Office of Court Administration  
1015 Sumter Street  
Suite 200  
Columbia, SC 29201

Re: Mary Ellen Valent v. Celeste Nicole Delaplane  
Appellate Case No. 2013-002584

**RECEIVED**

APR 29 2014

**SC Court of Appeals**

Dear Sir or Madam:

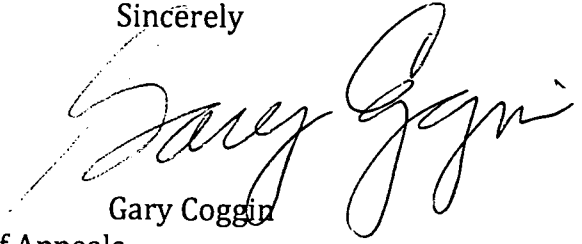
Last week I received a letter from Ms. Allen, Deputy Clerk of the South Carolina Court of Appeals, advising me of certain deficiencies in transcript related document that I had sent the Appellate Court in March, 2014.

These deficiencies were that I had not provided copies of transcript related correspondence to opposing counsel or to the office of administration as required by the South Carolina Appellate Court Rules. Accordingly, please find enclosed, copies of all correspondence I have had regarding this appeal including the NOTICE OF APPEAL and the AMENDED PROOF OF SERVICE. I am enclosing all the documents that attach to this matter out of an excess of caution that I may leave something out. These are as follows:

1. Notice of Appeal (12/05/2013)
2. Amended Proof of Service (12/05/2013)
3. Letter to Clerk of Appellate Court Jenny Kitchings (12/05/2013)
4. Letter to Court Reporter Wanda Roe (12/05/2013)
5. Letter to Court Reporter Sandy Holston (12/24/2013)
6. Letter to Ms. Holston (01/24/2014)
7. Letter to Ms. Holston (03/04/2014)
8. Letter to Emelia South Carolina Court of Appeals (03/27/2014)

So that you will timely receive these document, I will post the same to you via express mail on April 28, 2014. Please contact me with any questions.

Sincerely

A handwritten signature in black ink, appearing to read "Gary Coggin". The signature is written in a cursive style with a large, looping initial "G".

Gary Coggin

Copy: Deputy Clerk of South Carolina Court of Appeals  
Julian Kane Allen, Opposing Counsel  
Enclosures

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December 5, 2013

Wanda Roe  
Court Reporter  
P.O. Box 146  
Beaufort, South Carolina 209901

**Re:** Mary Ellen Valent v. Celeste Nicole Delaplane; Case Number 2012-CP-07-01942

**Judge:** The Honorable Brook P. Goldsmith  
**Date of Trial:** November 4, 5 2013  
**Place:** Beaufort County Courthouse  
**Defendant Attorney:** Julian Allen

Dear Ms. Roe:

I have been informed by court administration that you were the court reporter in the above referenced case. Because I am appealing one the rulings made by Judge Goldsmith in the case, pursuant to Rule 207(a)(1) SCACR, I request that you furnish me a full or, if applicable, a partial transcript of the case.

With this said, I request that you provide me with the following information: a) cost of transcription; b) other costs, i.e. mailing, duplication, etc.; c) the number of pages that specifically concern the Defendant's Motion to Dismiss the Plaintiff's cause of action sounding in Intentional Infliction of Emotional Distress; d) payment procedure and; e) time of delivery.

Lastly, while Court Administration told me you were the reporter of this case, the court reporter's identified on the Form 4 Judgement in a Civil Case is Joy E. Holston. Please advise me by telephone or email me if you were the reporter for this trial.

Sincerely,

  
Gary Coggin Law

Copy: Joy Holston  
GPC/cab

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March 4, 2014

Joy E. Holston  
118 Sandy Beach  
Prosperity, SC 29127

**Re:** Mary Ellen Valent v. Celeste Nicole Delaplane; Case Number 2012-CP-07-01942

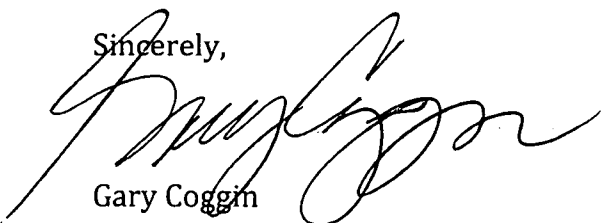
**Judge:** The Honorable Brook P. Goldsmith  
**Date of Trial:** November 4, 5 2013  
**Place:** Beaufort County Courthouse  
**Defendant Attorney:** Julian Allen

Dear Ms. Holston:

As per my order for the transcript for trial of the above referenced case, I request that you call me as soon as possible. I am concerned about the deadline for delivery of the transcript. Please call me when you receive this letter.

I called your number for your address but could not get connected.

Sincerely,

  
Gary Coggin

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P.O. Box 7092  
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December 24, 2013

Joy Holston  
118 Sandy Beach Drive  
Properity, SC 29127

**Re:** Mary Ellen Valent v. Celeste Nicole Delaplane; Case Number 2012-CP-07-01942

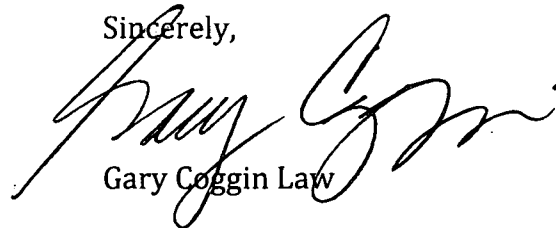
**Judge:** The Honorable Brook P. Goldsmith  
**Date of Trial:** November 4, 5 2013  
**Place:** Beaufort County Courthouse  
**Defendant Attorney:** Julian Allen

Dear Holston:

I am in receipt of your letter of December 11, 2013 wherein you indicate to me that payment for the transcript of the record of the above referenced case will \$568.75. Please find a check in that amount made out to you. For my purposes, all that I need for the appeal is everything before my opening statement—this would include all the pretrial until the trial begins with my opening to the jury.

With this said, as stated in your letter, you can return any unused funds to me.

Sincerely,



Gary Coggin Law

Copy: Mary Ellen Valent  
GPC/cab

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January 22, 2014

Joy Holston  
118 Sandy Beach Drive  
Prosperity, SC 29127

**Re:** Mary Ellen Valent v. Celeste Nicole Delaplane; Case Number 2012-CP-07-01942

**Judge:** The Honorable Brook P. Goldsmith

**Date of Trial:** November 4, 5 2013

**Place:** Beaufort County Courthouse

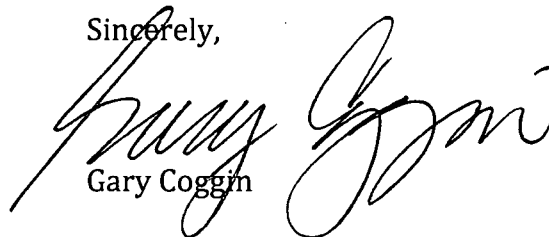
**Defendant Attorney:** Julian Allen

Dear Holston:

On December 24, 2013 I sent a check to you in the amount of \$568.75 with instructions to transcribe everything before my opening statement. **After a review of the case, I have decided to request that you transcribe the entire trial of the case.**

If you have any questions re this letter, please do not hesitate to contact me.

Sincerely,



Gary Coggin

Copy: Mary Ellen Valent  
GPC/cab

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Email: gcitylaw@aol.com

March 24, 2014

Emelia  
South Carolina Court of Appeals  
PO Box 11629  
Columbia, South Carolina 29211

Re: Appeal from: Mary Ellen Valent v. Celeste Nicole Delaplane  
Case Number 2012-CP-07-01942

**Judge:** The Honorable Brook P. Goldsmith  
**Date of Trial:** November 4, 5 2013  
**Place:** Beaufort County Courthouse  
**Defendant Attorney:** Julian Allen

Dear Emelia:

Per our telephone conversation this morning, I am enclosing for your review the letters I sent regarding the transcription of the case referenced above.

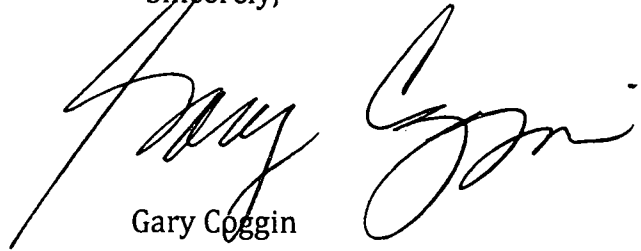
First there is the December 5, 2013 letter to Wanda Roe, copying Joy Holston, where I am trying to determine the identify of the trial reporter. As you will read, while I thought the reporter was Joy Holston, the Court Administration identified Wanda Roe.

Next I exchanged letters with Ms. Holston and on December 24, 2013, I sent a check along with instructions as to what I needed in the form of transcription. In January, I requested that Ms. Holston transcribe the entire trial of the case. As you can see, I did not receive the transcript and on March 4, 2014, I wrote to Ms. Holston re delivery of the same. On March 17, 2014, Ms. Holston posted the transcript via Priority Mail. I cannot remember when I picked it up at the post office last week but I plan to begin working on my submission draft this week and will post the same as soon as possible.

Again, as I told you this morning, I greatly appreciate the fact that you took the time to call me regarding this matter. I have been an attorney since 1992 and I say with reasonably certainty that this is the first time someone in the court system (any court) has taken the time to help me out.

Thank you so much.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Coggin". The signature is fluid and cursive, with the first name "Gary" written in a larger, more prominent script than the last name "Coggin".

Gary Coggin

Enclosures  
GPC/cab



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Time Accepted <input type="checkbox"/> AM <input type="checkbox"/> PM	Scheduled Time of Delivery	COD Fee	Insurance Fee
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