

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Active/Retired Circuit Court Judge

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Case No. 2012-CP-10-8135

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MOTION

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Karen Oliver,

Appellant,

v.

Amanda Lawrence and Trident United Way,

Respondents.

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MOTION

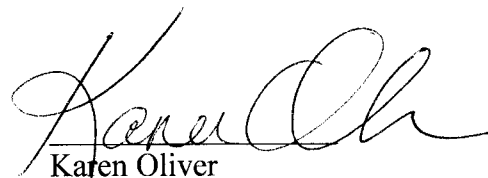
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Karen Oliver presents this motion for Reconsideration of her appeal due to extenuating circumstances involving her health following a car accident. The Appellant ask the court to allow her to regain physical her strength through her rehabilitation while under doctor's care. She experienced a setback last month. The Appellant's family currently has one parent who is non-ambulatory and now she has been at risk of having her ambulatory skills being limited. The Appellant is asking for the Court of Appeals to grant a Reconsideration and a Continuation in this matter. This ordeal has been very hard on her offspring as well as the Appellant.

Appellant, Karen Oliver, was not provided with a copy of the Motion for Dismissal and was not allowed to respond in accordance with the rule. Appellant is requesting that a copy of the Motion be lawfully provided by Respondents' counsel. On the Order received from the Court of Appeals its notes Fagnoli and Lindemann along with the Appellant to receive copies. The Appellant has never received any paperwork from any of these individuals concerning any recent Motion made to the courts.

Appellant, Karen Oliver, was not notified of any changes to the Respondents' legal counsel. Full Disclosure should have been made. Lindemann is not for the Appellant, therefore, this should have been disclosed to the Appellant. Compromising of the Appellant's right to full disclosure was made along with her Rights to Due Process. Please provide proof of disclosure.

Appellant, Karen Oliver, made the timely attempts to gain the transcript. Initially, within the guidelines of the rules. The Court Reporter did not respond. Again, the Appellant tried as instructed to the Court Administration. The Appellant had a major setback in her health in recovering from an accident. The Appellant is and has been willing to cooperate with the courts. The transcript is being ordered.

A handwritten signature in cursive script, appearing to read "Karen Oliver".

Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 485-8065  
Pro Se

Other Counsel of Record:  
Christy R. Fagnoli  
Clawson and Staubes, LLC  
126 Sevens Farm Drive Suite 200  
Charleston, SC 29492-8144  
Attorney for Respondents  
(843)577-2026

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Karen Oliver  
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(843) 485-8065  
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MEMORANDUM WITH CITATIONS OF SUPPORT

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The Appellant, Karen Oliver, made efforts to follow the procedures as outlined. The Rule for obtaining the transcript was followed. The Appellant did make the request. The Appellant was not initially made aware of any charges in her initial contact with the Office of Court Administration when inquiring about the court reporter contact information and about the transcript itself. The Appellant did as instructed by the Clerk of Court's office and made the submission to the Hon. Rosalyn Frierson. It was not until the setback in the Appellant's recovery that some misconfiguration of her intent to meet the standards were made. The Appellant is



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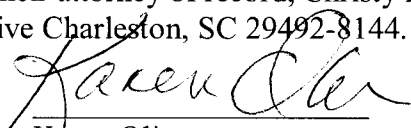
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PROOF OF SERVICE

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I certify that I served a copy of the letter showing remittance of payment to the court reporter on Amanda Lawrence and Trident United Way by depositing a copy of it in the United States Mail, postage prepaid, on August 4, 2014 addressed to their attorney of record, Christy Fagnoli of Clawson and Staubes, LLC 126 Sevens Farms Drive Charleston, SC 29492-8144.

August 4, 2014



Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 485-8065  
Pro Se

**RECEIVED**

AUG 07 2014

**SC Court of Appeals**

August 4, 2014

Mona Manley  
P.O. Box 557  
Mt. Pleasant, SC 29465

RE: Amanda Lawrence and Trident United Way et Al, Respondent, v. Karen Oliver, Appellant,  
Case No. 2012-CP-10-8135

Dear Ms. Manley:

Enclosed is the remittance of payment for the transcript for the above referenced case.

Sincerely,



Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 485-8065  
Pro Se

cc: Christy Fagnoli  
Clawson and Staubes, LLC  
126 Sevens Farm Drive Suite 200  
Charleston, SC 29492  
(843) 577-2026  
Attorney for Respondents  
Clerk, Court of Appeals

**RECEIVED**  
AUG 07 2014  
**SC Court of Appeals**

August 4, 2014

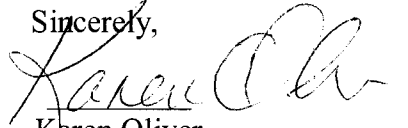
The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, South Carolina 29211

RE: Karen Oliver, Appellant, v. Amanda Lawrence and Trident United Way, Respondents.  
Appellate Case No. 2013-002587

Dear Ms. Kitchings:

Enclosed please review the remittance of payment for the transcript to the court reporter.

Sincerely,



Karen Oliver  
1945 Ghana Street  
Johns Island, SC 29455  
(843) 485-8065  
Pro Se

cc: Christy Fagnoli  
Clawson and Staubes, LLC  
126 Sevens Farm Drive Suite 200  
(843) 577-2026  
Attorney for Respondent

**RECEIVED**

AUG 07 2014

**SC Court of Appeals**

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Johns Island, SC 29455

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AUG 07 2014

**SC Court of Appeals**

Hon. Jenny Kitchens  
Clerk of Court  
South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC  
29211

