

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM CLARENDON COUNTY  
Court of Common Pleas

Ralph F. Cothran, Circuit Court Judge

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Case No.: 2014-CP-14-00017

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Michael J. Ferola, #291941,

Appellant,

v.

South Carolina Department of Corrections, Joseph Cannon, #295844,  
Officer Fulton, Michael Bowers, Kenneth Sharp,

Respondents.

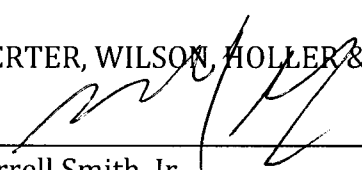
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MOTION TO REQUIRE APPELLANT  
TO ORDER TRANSCRIPT  
2014-001877

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The Respondents, by and through the undersigned attorney, requests that the Court order the Appellant to request a copy of the transcript from the hearing of July 30, 2014, pursuant to Rule 207 SCACR. To the knowledge of attorney for the Respondents, the Appellant has never ordered said transcript and your Respondents are informed and believe that it is necessary for the transcript of the proceedings to be in the record on appeal.

LEE, ERTER, WILSON, HOLLER & SMITH, L.L.C.

  
G. Murrell Smith, Jr.

126 North Main Street

Post Office Box 580

Sumter, South Carolina 29151

Telephone: (803) 778-2471

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Email: murrellsmith@leeandmoise.com

**RECEIVED**

NOV 06 2014

November 5, 2014

ATTORNEY FOR RESPONDENTS

**SC Court of Appeals**

Other Party of Record:  
Michael J. Ferola, Pro Se Appellant  
Ridgeland Correctional Institution  
Post Office Box 2039  
Ridgeland, SC 29936

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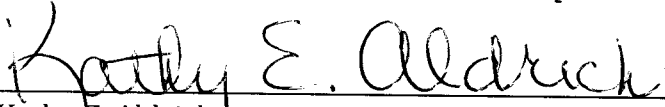
Respondents.

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PROOF OF SERVICE

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I certify that I have served the Motion for Extension of Time for Respondents to File Initial Brief and the Motion to Require Appellant To Order Transcript on Michael J. Ferola, #291941, by depositing a copy of it in the United States Mail, postage prepaid, on November 5, 2014, addressed to Michael J. Ferola, #291941, Ridgeland Correctional Institution, Post Office Box 2039, Ridgeland, SC 29936.

  
Kathy E. Aldrich

November 5, 2014

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**SC Court of Appeals**

# Lee, Erter, Wilson, Holler & Smith, L.L.C.

Jack W. Erter, Jr.  
Harry C. Wilson, Jr.  
David C. Holler\*  
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Attorneys at Law  
-----  
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November 5, 2014

Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, SC 29211

RE: Michael Ferola v. SCDC (4)  
Appellate Case No.: 2014-001877  
IRF No.: 04939  
Our File No.: S14.011

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**SC Court of Appeals**

Dear Ms. Kitchings:

Enclosed herewith please find two Motions in regards to the above-referenced matter. The first is a Motion for Extension of Time to file Respondents Initial Brief. The second is a Motion to Require Appellant to Order Transcript from the hearing on July 30, 2014.

It is my understanding from conversations with the Clerk's office that the Respondents Brief is due on or about November 14, 2014. Despite the Appellant's certificate on his brief, I did not receive a copy of said brief until October 24, 2014. Therefore, I am going to need some additional time to prepare this brief.

If you have any questions, please feel free to contact me. By copy of this letter to the Pro Se Appellant, I am hereby notifying him of my communication with the Court and providing him with copies of these motions as well as a Proof of Service for same.

I have also enclosed our firm's check in the amount of \$50.00 for the filing fee for both Motions.

Jenny Abbott Kitchings  
November 5, 2014  
Page 2

With kindest regards, I am

Sincerely,



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G. MURRELL SMITH, JR.

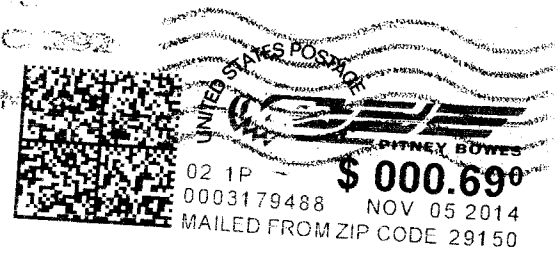
GMSjr:kea  
Enclosures

cc: Michael J. Ferola, #291941 (Pro Se Appellant)  
Ridgeland Correctional Institution  
Post Office Box 2039  
Ridgeland, SC 29936

Daniel Crooks, III, Esquire  
Nancy Stevenson (IRF # 04939)

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