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NOV 14 2014

SC Court of Appeals

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appellate Case No. 2014-002346

APPEAL from RICHLAND COUNTY Court of Common Pleas

Alison Renée. Lee, Circuit Court Judge

Circuit Court Case No. 2013-CP-40-03525

City of Columbia, South Carolina,

Respondent,

v.

Marie-Thérèse Assa'ad-Faltas, MD, MPH,

Appellant.

APPELLANT'S MOTION FOR TRANSCRIPT AT STATE EXPENSE


By her undersigned counsel, Appellant Marie-Thérèse Assa'ad-Faltas, MD, MPH, hereby respectfully moves this Court to afford her, at state expense, the transcript of the December 13, 2013 hearing in this matter in the circuit court. In support hereof, Appellant shows the Court that she was found indigent by the lower courts and this latest transcript is necessary to properly prosecute this appeal.

Appellant respectfully cites to this Court the controlling cases of *Mayer v. City of Chicago*, 404 U.S. 189 (1971); *M.L.B. v. S.L.J.*, 519 U.S. 102 (1996); and their antecedents and progeny.

Appellant's counsel believes that consultation with opposing counsel is neither necessary nor proper for this motion. Therefore, he did not consult with opposing counsel before filing this motion.

WHEREFORE, this motion should be granted and the filing hereof should be taken as a substitute for a transcript order.

Respectfully submitted on November 14, 2014


Orin G. Briggs, SC Bar # 883, Volunteer Attorney for Appellant
240 Heritage Trail, Lexington, SC 29072
(803) 957-4383

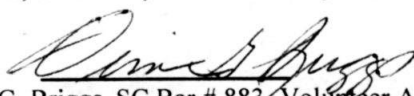
CERTIFICATE OF SERVICE

I certify that, on November 14, 2014, this document was served, by personal delivery of a copy thereof to the respective offices on the entities identified below, as proven by the attached declaration under penalty of perjury of Marie-Thérèse Assa'ad-Faltas, MD, MPH:

The City Attorney for the City of Columbia, Attorney for Respondent, at her office located at 1401 Main Street, Columbia, South Carolina, 29201; and

The Attorney General of South Carolina, potential Appellate Counsel for Respondent, at his office located at 1000 Assembly Street, Columbia, South Carolina, 29201.

November 14, 2014


Orin G. Briggs, SC Bar # 883, Volunteer Attorney for Appellant

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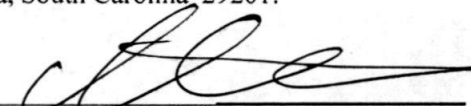
Appellant.

DECLARATION UNDER PENALTY OF PERJURY AS PROOF OF SERVICE OF MOTION IN THIS APPEAL

I declare under penalty of perjury that, on November 14, 2014, God so willing, the foregoing motion in the above-captioned matter was served, by personal delivery of a complete copy thereof with and all attachments thereto, if applicable, to the respective offices of the entities identified below:

1. The City Attorney for the City of Columbia, Attorney for Respondent, at her office located at 1401 Main Street, Columbia, South Carolina 29201; and
2. The Attorney General of South Carolina, potential Appellate Counsel for Respondent, at his office located at 1000 Assembly Street, Columbia, South Carolina 29201.

And further declarant saith not on November 14, 2014.


Marie-Thérèse Assa'ad-Faltas, MD, MPH