

STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
DEC 29 2014  
SC Court of Appeals

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APPEAL FROM BERKELEY COUNTY  
Court of Common Pleas

Robert E. Watson. – Master-in-Equity

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APPELLATE CASE NUMBER 2014-002580

Clyde Morris.....Respondent,

v.

Joseph V. Johnson, III, Joseph V. Johnson, Sr., Mildred R. Johnson, Joseph V.  
Johnson, Jr., William Johnson and Allen R. Barnette, Defendants,

of whom Joseph V. Johnson, Sr..... Appellant

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MOTION REQUESTING PERMISSION TO ORDER TRANSCRIPT  
OUTSIDE OF THE FILING DEADLINES

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THIS APPEAL IS PRESENTLY PENDING BEFORE THE COURT AND APPELLANT FAILED TO TIMELY PROVIDE A COPY OF THE LETTER REQUESTING TRANSCRIPTS FROM COURT REPORTER, AS REQUIRED BY RULE 207, SCACR.

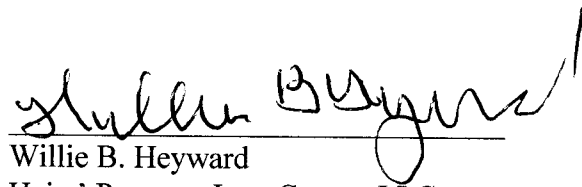
TRANSCRIPTS FROM THE INITIAL PROCEEDINGS IN THIS MATTER MAY NOT BE AVAILABLE AND APPELLANT'S COUNSEL HAS REQUESTED FROM THE COURT ANY RECORD OF THESE PROCEEDINGS, INCLUDING EXHIBITS. PROOF OF SERVICE OF NOTICE TO COUNSEL FOR THE RESPONDENT IS BEING GIVEN SIMULTANEOUSLY WITH THE FILING OF THIS MOTION.

APPELLANT IS SIMULTANEOUSLY FILING THE SAID LETTER REQUESTING TRANSCRIPTS AND PROOF OF SERVICE FOR THE SAME HEREWITH.

WHEREFORE, BECAUSE THE ABOVE FAILURE WAS HARMLESS AND WITHOUT PREJUDICE TO THE RESPONDENT, APPELLANT MOVES THAT THE APPELLATE COURT TO ALLOW THE LETTER REQUESTING TRANSCRIPTS TO BE FILED OUTSIDE OF THE TIME-FRAME ALLOWED BY

RULE 207 SCACR.

December 26, 2014



Willie B. Heyward  
Heirs' Property Law Center, LLC  
27 Gamecock Ave., Suite 200  
Charleston, SC 29407  
(843) 225-8754  
Attorney for Appellant

Christopher J. Loudon  
Office of Chris J. Loudon  
PO Box 253  
Moncks Corner, SC 29461  
Attorney for Respondent

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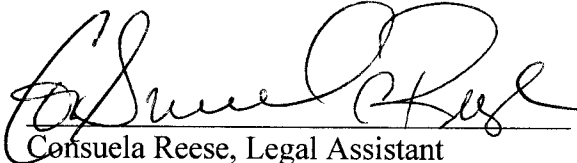
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**PROOF OF SERVICE**

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I certify that I have served a copy of the letter requesting transcripts and/or exhibits to all counsel of record by depositing copies of the same in the United States Mail postage prepaid, on December 26, 2014 addressed as follows:

Christopher J. Loudon  
Office of Chris J. Loudon  
PO Box 253  
Moncks Corner, SC 29461

  
Consuela Reese, Legal Assistant  
Heirs Property Law Center, LLC

**Heirs Property  
Law Center, LLC**

27 Gamecock Ave., Suite 200  
Charleston, SC 29407

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South Carolina Court of Appeals  
Jenny Abbott Kitchins, Clerk  
PO Box 11629  
Columbia, SC 29211

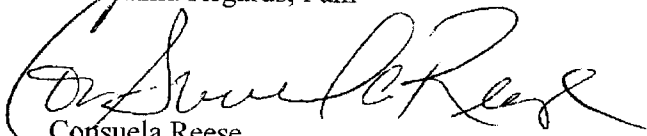
**Re: Clyde Morris vs. Joseph V. Johnson, et al.**  
**Case No.: 2012-CP-08-00284**  
**Appellant Case No.: 2014-002580**

Dear Sir / Madam:

Enclosed please find an original and one copy of Motion Requesting Permission to Order Transcript Outside of the Filing Deadlines and Proof of Service. Please file same and return the clocked copy in the self-addressed envelope provided herein.

I am also including a copy of the letter to Judge Robert E. Watson requesting the exhibits and a copy of the letter to the court reporter requesting the transcript.

With Kind Regards, I am



Consuela Reese  
Legal Assistant to  
Willie B. Heyward  
Attorney for Appellant

cc: Christopher J. Loudon  
Office of Chris J. Loudon  
PO Box 253  
Moncks Corner, SC 29461  
Attorney for Respondent

Heirs Property  
Law Center, LLC



27 Gamecock Ave., Suite 200  
Charleston, SC 29407

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December 26, 2014

Honorable Robert E. Watson  
Master-in-Equity  
Berkeley County, South Carolina  
300 California Ave.  
Moncks Corner, SC 29461

**Re: Clyde Morris vs. Joseph V. Johnson, Sr., et al.**  
**Case No.: 2012-CP-10-00284**

Dear Judge Watson:

There was a hearing held before you on February 19, 2014 at 9:30 AM in the above-referenced matter. There was no court reporter present at the hearing but I do not know if there was a record made of the proceedings. If so, please advise as to the procedure and costs to have this record transcribed. Additionally, there were exhibits submitted to the court from both the Plaintiff and the Defendant. I am also requesting copies of those exhibits. I have enclosed a self-addressed stamped envelope for your convenience.

Please advise as to the costs involved in having these items copied, transcribed and mailed in a form sufficient to file with the appellate court..

Thank you for your kind consideration in this matter.

Willie B. Heyward  
Attorney for Appellate

cc: Christopher J. Loudon  
Office of Chris J. Loudon  
PO Box 253  
Moncks Corner, SC 29461  
Attorney for Respondent

**Heirs Property  
Law Center, LLC**

27 Gamecock Ave., Suite 200  
Charleston, SC 29407

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**SC Court of Appeals**

December 26, 2014

Creel Court Reporting, Inc.  
1230 Richland Street  
Columbia, SC 29201

**Re: Clyde Morris vs. Joseph V. Johnson, et al.**  
**Case No.: 2012-CP-08-00284**  
**Appellant Case No.: 2014-002580**

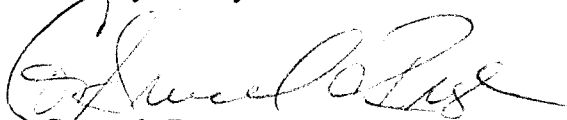
Dear Sir/Madame:

On July 8, 2014, the above case was tried before the Honorable Robert E. Watson, Master-in-Equity for Berkeley County. My records indicate that Vicki Nottle of Creel Court Reporting, Inc. was the court reporter for this hearing.

I am requesting a duplicate sealed copy of the transcript. The original sealed copy was opened due to a hearing held on October 10, 2014.

I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Thank you for your kind consideration in this matter.



Consuela Reese  
Legal Assistant to  
Willie B. Heyward  
Attorney for Appellant

cc: Chris J. Loudon  
Office of Chris J. Loudon  
PO Box 253  
Moncks Corner, SC 29461  
Attorney for Respondent