

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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

Case No. 2012-CP-10-8135

MOTION

RECEIVED

JAN 12 2015

SC Court of Appeals

74736

Karen Oliver,

Appellant,

v.

Amanda Lawrence and Trident United Way,

Respondents.

MOTION

Karen Oliver, Appellant, comes before the court for Reconsideration for the extension of the submission date for the Initial Brief due to a lack of cooperation from the court reporter in the Challenges presented to her without a response for over 45 days. The court reporter has referred the Appellant to the S.C. Court Administration for any further inquiry. The Appellant has in fact contacted Desiree Allen and Rosalyn Frierson of that agency to try and gain resolution to the Challenges. The Appellant has requested preferably, a review of the audio, video and stenographer's notes by both sides in comparison to the initial transcript that has been produced. Due to the difference of opinion between the court reporter [who is being allowed to **usurp** the

powers of the Constitution, the courts, my Rights to Due Process and my Civil Rights] and the Appellant [who when she requested a court reporter expected to be provided one that was competent in the integrity of the task at hand] and to preserve her Rights to Due Process this request is being made for further review. A reliable transcript is paramount in order to provide an equitable judicial process. My right to a reliable transcript should not be subjugated to the bias opposing counsel. It should not be left up to Mona Manley to decide what are words said by the judge and the opposing counsel to be omitted without regard to equal rights and justice for all involved.

On pages 19 – 21 of the court reporter's manual Section XIV TRANSCRIPTS

- A. Requests for Production of Transcript There is no permission given to court reporter's to omit statements made by the judge or opposing attorney. It does not provide any provisions for Mona Manley's actions.

Page 24 Section XV PRODUCTION OF THE TRANSCRIPT Clearly states: *in the appeal process, the transcript is the official document which provides the appellate court reliable information regarding trial court proceedings.*

Mona Manley by omitting the statements of the judge and opposing counsel has taken everyone's right to reliable information regarding trial court proceedings. Therefore, violating the S.C. Court Administration's guidelines for court reporters.

Again, I am requesting that all sides sit down and review the audio, video and stenographer's notes to provide an equitable playing field to obtain a reliable transcript with regards to the Challenges made and can be proven upon review of the court's audio and video along with the stenographer's notes. Due to Andrew Lindemann, opposing counsel, not being

present at the Proceedings he is not able to contribute in a meaningful fashion. In his Reply to the previous Motion Andrew Lindemann noted that there were no issues with the court reporter.

Now I provide you with the issues and what appears not to be an isolated case when it comes to issues with transcripts. The court reporter's refusal to just provide a review with both sides and a copy of the aforementioned items shows an unwillingness to provide me with my undeniable Right to Due Process and be able to present my case with an unbiased and reliable transcript. I should have been able to present my case in an unbiased courtroom environment where lady Justice is supposed to have been blind. No more taking advantage of the "*underprivileged.*" I was cognizant and a participant, not a bystander, in the Proceedings and I know what took place. Order of events below gives a brief account of our correspondences.

Unreliable transcript received:

Court reporter notified of Freedom of Information Act request:

Challenges presented to court reporter:

Insufficient response received:

Appellant reply to court reporter's response:

Appellant contact after no response:

Court reporter refuses to receive further documentation from Appellant

Again, Appellant contacts S.C. Administration:

Court Reporter's quality checked version in no way indicates (omits) the **vital** comments made:

Page Three:

1. Christy Fagnoli: informed Judge Nicholson that the issues to be discussed would not take long. THIS DONE FROM THE PUBLIC GALLERY (viewing area) OF THE COURTROOM WITH THE LEGAL TEAM FOR THE OTHER CASE ON THE DOCKET ALREADY SET UP TO GO IN THE COURTROOM'S WELL
2. Judge Nicholson: Asking the legal teams who were already set up in the courtroom's well if they would allow us to go ahead of them.
3. The response from both legal teams of Case:
4. Judge Nicholson allowing us to come forward from the public gallery (viewing area) to allow the hearing to take place. Otherwise, the entire hearing by the court reporter's version took place in the public gallery (viewing area).

Page Eleven Line 25:

Christy Fagnoli: argued for Rule 59g and did not easily give in as stated, she argued further to have a ruling against the then Plaintiff now Appellant.

Page Eight

The Court Reporter omitted Judge Nicholson's refusal to receive the copies of the Filed Exhibits and the refusal to allow the distribution of them to the Respondents' attorney.

Page 15 Line 5:

The Court Reporter omitted Judge Nicholson's refusal to allow me to speak and the words used to abruptly ending the hearing.

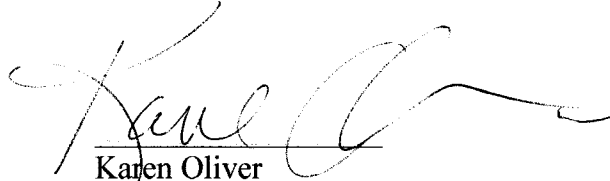
After the article dated, December 22, 2014 appeared in the Post and Courier, *Convicted murderer granted new trial due to inadequate trial transcript*, revealing a serious inefficiency in the competent and reliable application of the steps to provide a transcript that is fair to both parties without bias by the transcriber. I cry, "Foul." A pattern that shows a possibility of the

Violation of Civil Rights, Right to Due Process and collusion. Painstakingly, it appears to be the same judge in one of the cases, same area of issues- transcripts and court reporters. Greg Voigt, who prosecuted the case that is now back to square one for a convicted murderer is quoted as saying, “The cost of that court reporter’s negligence really affects the whole system. It should never happen. That should be the most reliable part of the system.” My Initial Brief will be compromised without a reliable transcript that is why the Appellant requests an extension to the date due to the negligence (as the prosecutor puts it) of not being provided with a reliable transcript.

Also, the Appellant request that the Respondents be provided with a reliable transcript. In the equitable spirit of the laws of our state, a reliable transcript is due to them as well as the Appellant. A review of the audio, video and stenographer’s notes in comparison to the initial transcript received will allow Andrew Lindemann a fairer representation for his clients—the Respondents. A review of the audio, video and stenographer’s notes provides no advantage to anyone. As it stands now, the playing field is not leveled. The court is being asked to grant the permission of the review of the audio, video and stenographer’s notes by the panel of judges to preserve the Right to Due Process. The court reporter has omitted statements by the judge and the opposing counsel. I have filed an official complaint with S.C. Court Administration. I would like all sides to come together and review the aforementioned materials to provide equity in what is supposed to be the most reliable part of the process.

Notice of this Motion has been provided to the Respondents’ attorneys. Proof of Service is provided.

The Appellant is asking for an extension of the time limit for the submission of the Initial Brief until a response is made by the courts on this motion and the court reporter's response to the challenges of the transcript.



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Pro Se

Other Counsel of Record:
Christy R. Fagnoli
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Attorney for Respondents
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THE STATE OF SOUTH CAROLINA
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APPEAL FROM CHARLESTON COUNTY
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J.C. Nicholson, Jr., Active/Retired Circuit Court Judge

Case No. 2012-CP-10-8135

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Appellant,

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Respondents.

MEMORANDUM WITH CITATIONS OF SUPPORT

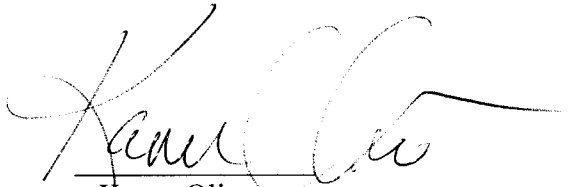
The Appellant, Karen Oliver, seeks to obtain a review of the audio and video recording of the proceedings referenced beforehand. The Appellant seeks to have a review of the aforementioned items due the omission of the statements of the judge and opposing counsel by the court reporter to ensure that her Right to Due Process is not compromised. Also, an extension of the time limit for the Initial Brief is being requested since the transcript does not reliably depict what took place in court. Contrary to the purported purpose of the transcript as presented in the court reporter's handbook. The transcript must be verbatim page 25 of the court reporter's manual. The omission of the statements compromises the integrity of the transcript. Parenthetical use to ensure clear understanding of the record to show that an event has transpired (i.e., when

the judge asked the legal teams that were already in the courtroom's well and asked if they would allow us to go ahead of them and the switch took place) according to the court reporter's handbook page 29.

1

¹ Court Reporter's Manual State of South Carolina pages 19-21, 24

² Post and Courier, December 22, 2014, *Convicted murderer granted new trial due to inadequate trial transcript.*

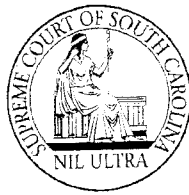


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South Carolina Court Administration
South Carolina Supreme Court
Columbia, South Carolina

ROSALYN FRIERSON
DIRECTOR

1015 SUMTER STREET, SUITE 200
COLUMBIA, SOUTH CAROLINA 29201
TELEPHONE: (803) 734-1800
FAX: (803) 734-0269

September 30, 2014

Ms. Karen Oliver
1945 Ghana St.
Johns Island, SC 2455

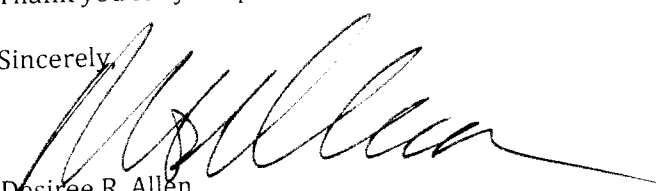
Dear Ms. Oliver:

Your letter to Rosalyn Frierson dated September 27, 2014, was forwarded to my office for response. In your letter you are requesting a copy of the audio and videotape of the proceedings. To my knowledge, there is no videotape of the proceedings. With regard to audio, there is no provision for providing an audiotape of the court proceedings. The written transcript is the official record. You have requested that Ms. Manley review the submission because the copy you received of the transcript is not accurate. There is a procedure to challenge the accuracy of the transcript.

That procedure is found in the South Carolina Court Reporter Manual. It reads as follows, "When there is a challenge to the accuracy of a transcript, the court reporter will respond to the challenger in writing. The court reporter will then review the records and report the findings in writing to the challenger, with a copy to all parties and Court Administration. Any inaccuracies will be corrected and the pages forwarded to the challenger at no cost. Further review of the record may be permitted by the presiding judge upon written request with good cause shown. If no challenge is received by the court reporter within the 30-day period the tapes may be reused for destroyed".

Please do not delay in submitting your specific challenge in writing to the court reporter, who will report her findings in writing. By copy to Ms. Manley, I am requesting that she follow the procedure outlined above upon receipt of a letter from you outlining the items that you find to be inaccurate. Thank you for your patience.

Sincerely,



Desiree R. Allen

Court Reporter Manager

CC: Rosalyn Frierson, Director, S.C. Court Administration
Jenny Kitchings, Clerk, S.C. Court of Appeals
Mona Manley, Official Court Reporter

October 4, 2014

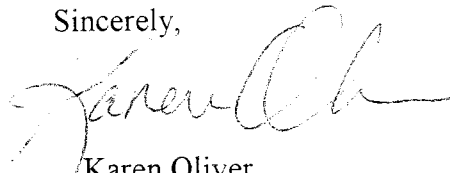
Mona Manley
P.O. Box 4516
Beaufort, SC 29906

RE: Case No. 2012-CP-10-8135
Subject: Freedom of Information Act Request

Dear Mona Manley:

I am submitting this request for a copy of the audio recording of the proceedings referenced above. In accordance with the Freedom of Information Act, I was a participant in the proceedings and would like a copy of the recordings. Please provide me with any cost or material needed that are involved and I will be glad to accommodate it. I look forward to receiving your response. Please have a good day.

Sincerely,



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

cc: Christy Fagnoli, Clawson and Staubes, LLC
Andrew Lindemann, Davidson & Lindemann P.A.
S.C. Court Administration
✓ Clerk, Court of Appeals

Mona Manley, Circuit Court Reporter
South Carolina Judicial Department
P.O. Box 4516
Beaufort, SC 29906-4516
(850) 893-6662

Re: Amanda Lawrence and Trident United Way, Respondent
Karen Oliver, Appellant Case No. 2012-CP-10-08135

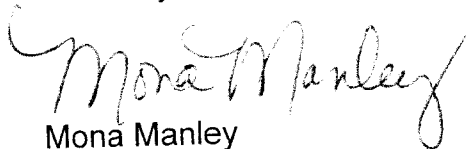
Dear Ms. Oliver,

I have received your letter requesting the audio and/or video of the hearing held on October 9, 2013 before Judge Nicholson. There is no provision for providing either, as the official record is contained in the transcript you have received.

Although you did not question the accuracy of the transcript in your letter I took it upon myself to further review my stenographic notes of the proceeding and have confirmed that it supports the transcript. If further review is requested, you may do so of the presiding judge with good cause shown.

If there are any specific portions of the transcript which you would like me to further review please provide detail of the exact portion, stating page and line number, so that I may address your concerns. I look forward to hearing from you and getting this matter resolved promptly.

Sincerely,



Mona Manley
Circuit Court Reporter

Cc: Desiree R. Allen, Court Reporter Manager

October 16, 2014

Mona Manley
P.O. Box 4516
Beaufort, SC 29906

RE: Case No. 2012-CP-10-8135
Subject: Second Request via Freedom of Information Act and Challenges to Transcript

Dear Mona Manley;

I am submitting a second request for a copy of the audio and video recording and now to include any stenographer's notes of the proceeding referenced above. In accordance with the Freedom of Information Act I have a right to receive a copy of the audio and video recordings along with any stenographer's notes. To avoid the appearance that any form of collusion has taken place along with preserving my Rights to Due Process.

Specific Challenges:

Page Three Lines 1-16 took place in the public gallery as the judge spoke from the bench. The legal team for the case that was held on the same date was already seated and had their paperwork and visual aids set up. Your depiction omits some very vital information that has already been recorded in another format (complaint and Motion).

Page Three:

5. Christy Fagnoli: informed Judge Nicholson that the issues to be discuss would not take long. THIS DONE FROM THE PUBLIC GALLERY (viewing area) OF THE COURTROOM WITH THE LEGAL TEAM FOR THE OTHER CASE ON THE DOCKET ALREADY SET UP TO GO IN THE COURTROOM'S WELL
6. Judge Nicholson: Asking the legal teams who were already set up in the courtroom's well if they would allow us to go ahead of them.
7. The response from both legal teams of Case:
8. Judge Nicholson allowing us to come forward from the public gallery (viewing area) to allow the hearing to take place. Otherwise, the entire hearing by the court reporter's version took place in the public gallery (viewing area).

Page Eleven Line 25:

Christy Fagnoli: argued for Rule 59g and did not easily give in as stated, she argued further to have a ruling against the then Plaintiff now Appellant.

Page Eight

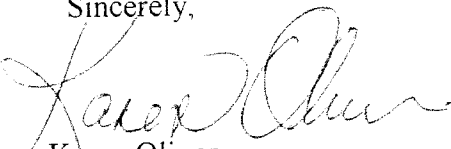
The Court Reporter omitted Judge Nicholson's refusal to receive the copies of the Filed Exhibits and the refusal to allow the distribution of them to the Respondents' attorney.

Page 15 Line 5:

The Court Reporter omitted Judge Nicholson's refusal to allow me to speak and the words used to abruptly ending the hearing.

I look forward to receiving your response to my requests. Again, if there are any cost involved please let me know.

Sincerely,



Karen Oliver

CC:

Court Administration
Clerk of Court
Attorney for Respondents: Lindemann and Fagnoli

Mona Manley, Circuit Court Reporter
South Carolina Judicial Department
P.O. Box 29906-4516
850-893-6662

October 21, 2014

Re: Amanda Lawrence and Trident Way, Respondent, and Karen Oliver, Appellant
Case No. 2012-CP-10-08135

Dear Ms. Oliver,

I have received your most recent letter wherein you have requested changes be made to the official transcript. The changes you are requesting would not be part of the transcript, as the official record does not begin until the judge indicates the commencement of a proceeding in a case.

As far as your request to note the parties in the courtroom, there is no provision in law for every person in the courtroom at the time of a proceeding to be noted on the appearance page of the transcript. Unless a proceeding is deemed confidential by the judge, judicial proceedings are open to the public. If any party themselves would like to place that type of information on the record they are more than welcome to, but as that was not done there would be no way to re-create a listing of any and all persons in the courtroom at that exact time.

As far as what you referred to as the judge's abruptness in concluding the hearing, I am sorry to say that there is no way to show any actions you may have perceived from the Judge himself while he was making his conclusory remarks. If you would like to inquire further of the Judge as to what you felt was an abrupt conclusion you may do so by contacting his office directly.

I regret that you continue to have concerns over this proceeding. My office would be more than happy to discuss this further and look forward to having this matter resolved.

Sincerely,



Mona Manley

Cc: Desiree R. Allen, Court Reporter Manager

**Mona Manley, Circuit Court Reporter
South Carolina Judicial Department
P.O. Box 4516
Beaufort, SC 29906-4516
(850) 893-6662**

December 15, 2014

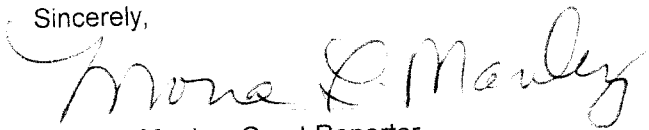
Re: Amanda Lawrence and Trident United Way, Respondent
Karen Oliver, Appellant Case No. 2012-CP-10-08135

Dear Ms. Oliver,

I have received your letter dated December 8, 2014. You will find our policy detailed for you in not only the last two letters from myself, but also the letter you received from Court Administration. I am sorry to inform you that I have no new policy and/or explanation for you at this time. It is no longer necessary for you to continue contacting me. I have responded to your request and your challenge.

Any further correspondence from you regarding this matter will be forwarded to Court Administration without a response from me. If any new or additional information about this matter becomes available I will promptly apprise you of that by way of written correspondence. Until then I wish you well in your endeavors and hope you have a just outcome in this matter.

Sincerely,



Mona L. Manley, Court Reporter

cc: (via email)
Court Administration/Desiree Allen
Christy Fagnoli, Esquire
Andrew Lindemann, Esquire
Judge Nicholson

December 30, 2014

Desiree Allen
South Carolina Court Administration
1015 Sumter Street Suite 200
Columbia, SC 29201

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

Dear Ms. Desiree Allen:

Please be advised of the attached letter received from your court reporter, Mona Manley. She continues to provide no meaningful response and has directed me to provide any further inquiry to your agency - Attachment 1. I am seriously disappointed with the attempt to “**usurp**” the powers of the courts and one’s Civil Rights by way of misuse of transcripts. I have asked for assistance in specific areas (Challenges made) which remains due to the **unreliability** of the initial transcript. To no avail have I gotten my Challenges resolved or even regarded with respect to the obvious solution – a review of the video, audio and stenographer’s notes by all parties involved. Due to the lack of cooperation of the court reporter this is the most equitable solution. Even the opposing current counsel would not be able to provide meaningful input of the Proceedings because he was not present – Andrew Lindemann.

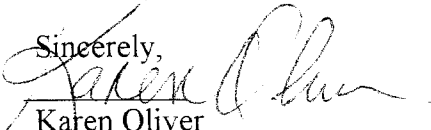
It appears that this is not an isolated case. It may be a systemic problem. Therefore, I am asking that you provide statistical data of all or any complaints that has been received by your agency about transcripts in the past 10 years. Also, how many times have challenges been made to transcripts? It appears that the Justice Department needs to intervene here because there seems to be a disturbing pattern even without the requested data being provided. Please see an article that you were a participant being interviewed – Attachment 2. So, convicted murderers have more rights than me? I asked that question before in reference to equitable use of the courtroom to the Commission of Judicial Conduct and I ask it again. Strange, no, indescribable sometimes how God works things out. Same judge, same type of issue, same counterparts (court reporter) I don’t want to question the supervision, but integrity level is being questioned of this court reporter. Lives are in these people’s hands. God said, “No”, this time. I am a child of the Most High God. Even if you go with the so-called transcript initially provided. I am providing the evidence that the appearance of collusion to the Justice Department and any disregard by the Judicial Branch.

It was I who ordered the court reporter’s appearance. As her intermediate employer, I must report that I am not satisfied with her performance to try and deny my Right to Due Process and the violation of my Civil Rights. As stated in previous correspondence I would like to file an official complaint aside from the Challenges to the transcript itself to ensure that this matter is

taken seriously. A grieving family is still without closure due to a court reporter's disregard for the integrity of the transcript. Again, my Challenges have been made without sufficient response. A review of the recorded video, audio and stenographer's notes and the initial transcript provided will show an extreme variance (omissions of the judge's and opposing attorney's-Fargnoli statements) of the contents/context. I was cognizant and a participant in the Proceedings. I know what I experienced. In conjunction, I am asking the Justice Department to come in and intervene because not only has my Constitutional Rights been violated so has my Civil Rights. Also, my rights as an intermediate employer by requesting the court reporter's services your agency was supposed to make sure that I was provided with a "**competent**" court reporter. Competency includes integrity for the task at hand. The Judicial system was supposed to provide equal rights and justice throughout the entire Proceedings.

Strange, how Attachment 1 has been forwarded to Judge Nicholson by the court reporter. Some may find even that to be inappropriate to directly contact the judge. I am not allowed to make any contact.

God is in control!!!

Sincerely,

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(843) 485-8065
Pro Se

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Attorneys for Respondents

Hon. Rosalyn Frierson

Clerk, Court of Appeals

Convicted murderer granted new trial due to inadequate trial transcript



Christina Elmore [Email](#) [@celmorepc](#)

Dec 22 2014 12:01 am [Dec 22 7:32 pm](#)

A convicted murderer has been granted a new chance at freedom because a Charleston County court reporter could not produce a transcript of his 5-year-old trial for appellate review.

Travis Maurice Hurst, 29, was transferred from Lieber Correctional Institution Dec. 9 and sent to the Charleston County jail to await a new trial.

He had faced 39 years in prison for gunning down Roni Perez-Ricardez, 24, in August 2007 near Johnson Cemetery on Stall Road.

Hurst confessed to the killing in talks with his friends, prosecutors argued during his first trial in August 2009.

His fingerprints and ammunition similar to what was used to kill Perez-Ricardez were found in an abandoned van that witnesses saw leave the scene, authorities had said.

A court reporter, identified in court documents as Deborah Everett, was in the courtroom for every minute of the three-day trial, and her job was to record the proceedings.

But when attorneys presenting Hurst's appeal later requested a transcript of the trial, they were told "significant portions of the transcript were unable to be transcribed due to missing or inaudible recordings," court documents stated.

Everett could not be reached for comment.

Backup audio recordings of trials are generally taken as a fail-safe, but the quality of such recordings is never a guarantee, said Assistant Solicitor Greg Voigt, who prosecuted the case. Everett attempted to reproduce a transcript of Hurst's trial using the backup recording, but, ultimately, she was unable to do so, he said.

Attorneys for Hurst filed a motion in March requesting that the missing portions of the record, roughly half of the document, be reconstructed, attorney Robert Dudek said. Circuit Judge J.C. Nicholson oversaw three hearings to revisit evidence, witnesses and the memories of the attorneys who had tried the case, but to no avail, he said.

"Judge Nicholson essentially made an exhaustive effort. He did everything he could to reconstruct the record, but this was a lengthy murder trial," Dudek said. "There were various legal rulings and objections that came up during the trial. At the end of the day, Judge Nicholson ruled the record could not be reconstructed to fairly provide Hurst with meaningful appellate review."

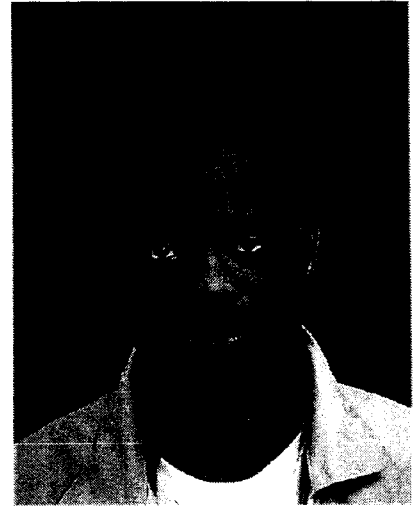
The state Court of Appeals granted Hurst a new trial based on Nicholson's determination. Considering the circumstances, Dudek said, the ruling was agreed upon by all sides.

Dudek and Voigt have both served in their respective careers for more than two decades. They both said they considered a court reporter's inability to produce an adequate transcript an aberration, but not unheard of.

A trial transcript that disappeared in 2012 opened a door for a potential third trial against James Summersett Jr., who had twice been convicted in the shooting death of his childhood friend, Julian Grant, in West Ashley in April 2002.

Summersett's 2003 conviction and life sentence were tossed out by the state Supreme Court due to errors committed by the trial judge. During his second trial, in 2010, a judge found Summersett guilty of voluntary manslaughter.

That charge carried a maximum 30-year sentence, but Summersett again received a life sentence due to a prior conviction for assault and battery with intent to kill. In 2012 while pursuing post-conviction relief, an attorney for Summersett requested a third trial after learning a transcript for his second trial had disappeared.



Hurst

Summersett's second conviction ultimately stuck, but a circuit judge in June agreed to reconsider his life sentence, court records show. The 9th Circuit Solicitor's Office and the state Attorney General's Office are in the process of appealing that decision.

The decision to grant Hurst a second trial has sent all involved back to square one.

Perez-Ricardez's next of kin was last known to be living in Mexico and has not yet been located or notified of the developments in the case, Voigt said. Witnesses will have to be tracked down and made available for upcoming proceedings. Hurst is still in the process of acquiring a new trial attorney.

Desiree Allen, who manages court reporters for the S.C. Court Administration, confirmed that Everett is no longer employed through the agency. She did not respond to a request for further comment.

In Voigt's eyes, there is no excuse for the slip-up.

"People who have exerted their right to a trial do so knowing it could go against them and they do so with a right to an appeal. You know the transcript is going to be the first order of business. Failure to maintain the record so that you can create a transcript is inexcusable," Voigt said. "The cost of that court reporter's negligence really affects the whole system. It should never happen. That should be the most reliable part of the system."

Reach Christina Elmore at 937-5908 or at [Twitter.com/celmorePC](https://twitter.com/celmorePC).

Keywords [Ninth Circuit Solicitor \(/section/search&facet.filter=Keywords:Ninth%20Circuit%20Solicitor\)](#)

[S.C. Court of Appeals \(/section/search&facet.filter=Keywords:S.C.%20Court%20of%20Appeals\)](#) [Travis Hurst \(/section/search&facet.filter=Keywords:Travis%20Hurst\)](#)

Comments

Notice about comments:

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We do not edit user submitted statements and we cannot promise that readers will not occasionally find offensive or inaccurate comments posted in the comments area. If you find a comment that is objectionable, please click the X that appears in the upper right corner when you hover over a comment. This will send the comment to Facebook for review. Please be reminded, however, that in accordance with our [Terms of Use \(/section/terms\)](#) and federal law, we are under no obligation to remove any third party comments posted on our website. Read our full [terms and conditions \(/section/terms\)](#).

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IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

JAN 12 2015

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

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

Case No. 2012-CP-10-8135

Karen Oliver,

Appellant,

v.

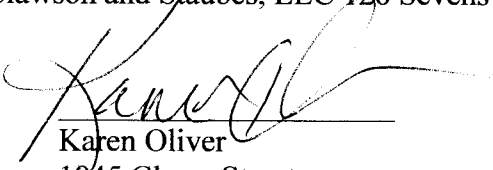
Amanda Lawrence and Trident United Way,

Respondents.

PROOF OF SERVICE

I certify that I served a copy of the Motion on Amanda Lawrence and Trident United Way by depositing a copy of it in the United States Mail, postage prepaid, on January 5, 2015 addressed to their attorney of record, Christy Fagnoli of Clawson and Staubes, LLC 126 Sevens Farms Drive Charleston, SC 29492-8144.

January 5, 2015



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

IN THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

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

Case No. 2012-CP-10-8135

RECEIVED

JAN 12 2015

SC Court of Appeals

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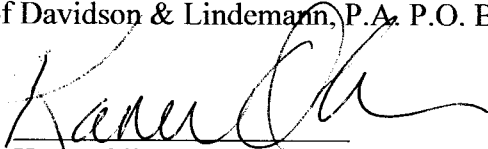
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January 5, 2015



Karen Oliver
1943 Ghana Street
Johns Island, SC 29455
(843) 485-8065
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January 5, 2015

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 for filing is a Motion. Also enclosed are the following:

- (1) Proof of service of to the known counsel for the respondents.
- (2) The original and other submissions will be mailed in accordance with the rule.
- (3) The \$25.00 fee.

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

Andrew Lindemann
Davidson & Lindemann, P.A.
P.O. Box 8568
Columbia, SC 29202
(803) 806-8222
Attorneys for Respondents

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SC Court of Appeals

