

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
MAR 16 2015
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2015-000330

Tracy Hines,

Respondent,

v.

Tarsha Y. Alexander, Personal
Representative of the Estate of
Clarence Ceal Alexander,

Appellant.

APPELLANT'S MOTION
REQUESTING PERMISSION TO ORDER TRANSCRIPT
OUTSIDE OF FILING DEADLINE

Ira D. Levy
Ira D. Levy, LLC
Post Office Box 31304
Charleston, SC 29417
Telephone: (843) 571-5000
Facsimile: (843) 852-9860
ATTORNEY FOR APPELLANT

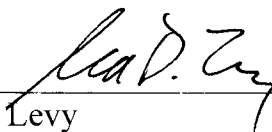
Other Counsel of Record:
Ashley G. Andrews
Catherine E. LaFond, P.A.
544 Savannah Highway
Charleston, SC 29407
ATTORNEY FOR RESPONDENT
(843) 762-3554

Appellant Tarsha Y. Alexander, Personal Representative of the Estate of Clarence Ceal Alexander, requests that this Court grant permission to order the transcript outside of the filing deadline.

This oversight by Appellant's counsel occurred due to a heavy workload and confusion with regard to the identity of the court reporter. This probate court appeal was heard by the Circuit Court during en masse motion hearings. Appellant's counsel came to court on November 18, 2014, with a court reporter; however, counsel discovered that the Circuit Court already had a reporter present for all matters, so he told his reporter that they were not required. Appellant's counsel ultimately discovered identity of the Circuit Court's reporter through numerous telephone calls to the Judge's law clerk and the Clerk of Court's office. The transcript has now been ordered.

For the foregoing reasons, Appellant requests that this Court grant permission to order the transcript outside of the filing deadline.

Respectfully submitted,
IRA D. LEVY, LLC



Ira D. Levy
Post Office Box 31304
Charleston, SC 29417
Telephone: (843) 571-5000
Facsimile: (843) 852-9860
ATTORNEY FOR APPELLANT

this 13th day of March, 2015,
Charleston, South Carolina.

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED
MAR 16 2015
SC Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

J. C. Nicholson, Jr., Circuit Court Judge

Appellate Case No. 2015-000330

Tracy Hines,

Respondent,

v.

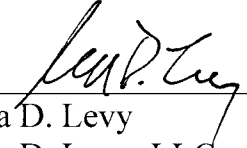
Tarsha Y. Alexander, Personal
Representative of the Estate of
Clarence Ceal Alexander,

Appellant.

PROOF OF SERVICE

I certify that I have served Appellant's Motion Requesting Permission to Order Transcript outside of Filing Deadline on Tracy Hines by depositing a copy of it in the United States Mail, postage prepaid, on March 13, 2015, addressed to his attorney of record, Ashley G. Andrews, Catherine E. LaFond, P.A., 544 Savannah Highway, Charleston, SC 29407.

this 13th day of March, 2015,
Charleston, South Carolina.



Ira D. Levy
Ira D. Levy, LLC
Post Office Box 31304
Charleston, SC 29417
Telephone: (843) 571-5000
Facsimile: (843) 852-9860
ATTORNEY FOR APPELLANT



IRA D. LEVY

Attorney at Law

764 ST. ANDREWS BLVD.

CHARLESTON, SOUTH CAROLINA 29403

ira@levylawsc.com

RECEIVED

MAR 16 2015

SC Court of Appeals

REPLY TO:

IRA D. LEVY, LLC

POST OFFICE BOX 31304

CHARLESTON, SC 29417

TELEPHONE:
(843) 571-5000

FACSIMILE:
(843) 852-9860

March 12, 2015

Ms. Karen Anderson
3592 Somerset Hills Crt.
Mt. Pleasant, SC 29466

Re: Hines v. Alexander, Case No. 2013-CP-10-5993

Dear Ms. Anderson:

On November 18, 2014, the above matter was heard before the Honorable J. C. Nicholson, Jr., Circuit Court Judge, in Charleston County. I have learned that you were the court reporter for this case.

Please provide me with a transcript of this proceeding, to include the entire record.

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

Should you have any questions or concerns, please do not hesitate to contact me. I am grateful for your assistance.

Very truly yours,

Ira D. Levy

Attorney for Appellant

/idl

cc: Ms. Ashley G. Andrews, Esquire
Clerk of Court, S.C. Court of Appeals
S.C. Court Administration



IRA D. LEVY

Attorney at Law

764 ST. ANDREWS BLVD.
CHARLESTON, SOUTH CAROLINA 29407
ira@levylawsc.com

RECEIVED
MAR 16 2015
SC Court of Appeals

TELEPHONE:
(843) 571-5000
FACSIMILE:
(843) 852-9860

PLEASE REPLY TO:
IRA D. LEVY, LLC
POST OFFICE BOX 31304
CHARLESTON, SC 29417

March 13, 2015

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia, SC 29211

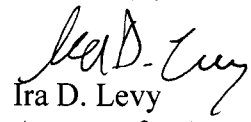
Re: Tracy Hines, Respondent, v. Tarsha Y. Alexander, Personal Representative of the Estate
of Clarence Ceal Alexander, Appellant, Appellate Case No. 2015-000330

Dear Ms. Kitchings:

Please find enclosed a copy of the letter showing that I have ordered the transcript from
the court reporter, a motion requesting permission to order the transcript outside of the filing
deadline, and a check for the motion filing fee.

I am grateful for your assistance.

Very truly yours,


Ira D. Levy
Attorney for Appellant

/idl

enclosures

cc: Ashley G. Andrews, Esquire
Catherine E. LaFond, P.A.
544 Savannah Highway
Charleston, SC 29407
(843) 762-3554

Tarsha Y. Alexander



IRA D. LEVY, LLC

Attorney at Law

POST OFFICE BOX 31304

CHARLESTON, SOUTH CAROLINA 29417

CHARLESTON SC 294

13 MAR 2015 PM 2 T



RECEIVED

MAR 18 2015

S.C. Court of Appeals

The Honorable Jenny Abbott
Kitchings
Clerk, S.C. Court of Appeals
PO Box 11629
Columbia, SC 29211

29211+1629

