

May 9, 2015

Motion to Request more time to acquire transcript

Sarah Rangel, Michael Dever, Wild Jumps, and Paisley's LLC. Case No. 2011CP1800508, request that the S.C. Appeals Court to allow more time for said parties to acquire trial court transcript due to discrepancy in number of pages and price as emails attached show.

**Very Truly yours,
Sarah Rangel**

cc: Paul B. Ferrara, III, Esquire

RECEIVED
MAY 13 2015
SC Court of Appeals



wild jumps <wildjumps@gmail.com>

Memo; Motion to Reconsider

mawhitsitt@gmail.com <mawhitsitt@gmail.com>

Tue, Jan 13, 2015 at 4:26 PM

To: wild jumps <wildjumps@gmail.com>

The portion of testimony that we used is good. There case was very weak on this point. Hopefully, he will change his mind. You can always appeal. In the grand scheme, the biggest issue is Sarah getting her buyout. That will wash out the judgment almost completely.

Respectfully,

Michael A. Whitsitt, Attorney
The Whitsitt Law Firm
1476 Ben Sawyer Boulevard, Suite 3
Mount Pleasant, South Carolina 29464
(843)696-8904

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Sent from my IPHONE

On Jan 13, 2015, at 4:10 PM, wild jumps <wildjumps@gmail.com> wrote:

No I did not remember that how can we show them to the judge that is pretty important

On Jan 13, 2015 3:53 PM, <mawhitsitt@gmail.com> wrote:

Yes but they werent admissable because Michael didn't show up to the trial. Remember?

Michael A. Whitsitt, Attorney
The Whitsitt Law Firm
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Sent from my IPHONE

On Jan 13, 2015, at 3:49 PM, wild jumps <wildjumps@gmail.com> wrote:

I believe you should have Michael's bank statements with money going to the jump castle companies

On Jan 13, 2015 2:40 PM, "Michael Whitsitt" <mawhitsitt@gmail.com> wrote:

Dear Judge Chellis,

Please find attached the requested memorandum. Copies of which have been placed in the mail to the clerk of court for filing and to Plaintiff's counsel.

If you have any questions or concerns, then please do not hesitate to contact me.

Respectfully,

--

Michael A. Whitsitt, Esquire
The Whitsitt Law Firm
1476 Ben Sawyer Boulevard, Suite 3
Mount Pleasant, South Carolina 29464
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wild jumps <wildjumps@gmail.com>

**FW: Transcription Requests: Sept 2014 jobs in <514 Jump Amusements-
vs-Rangel, et al>**

5 messages

Linda Brifnek <lbrifnek@scheduledepo.com>
To: "wildjumps@gmail.com" <wildjumps@gmail.com>
Cc: Cortney Botto <cbotto@scheduledepo.com>

Thu, May 7, 2015 at 5:00 PM

Michael/Sarah,

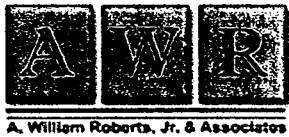
The estimated cost for transcribing the below trials would be \$4400.00. The charge is \$3.95 per page for a sealed original and copy. These trials have not been transcribed so if you are ordering you would be responsible for paying for the original transcript. The \$3.95 per page is the cost for the original but because it would be sealed we provide another copy of the transcript for you to view. The shipping charges will depend on the weight of the package so that is why I am giving the estimate of \$4400.00.

Our firm does not offer a payment plan so in order for us to transcribe the trials we would need a credit card payment for the \$4400.00. When we receive this deposit we will notify the reporters' to transcribe the trial. Once the reporters' submit the transcripts we will create an invoice and apply your payment. If the total is more than \$4400.00 we will contact you again for the balance to be paid in order to forward the transcripts. If the transcripts total less than \$4400.00, we will refund you the difference either by check or credit card refund.

If you are interested in ordering the transcripts please fill out the attached credit card form.

If you have any further questions concerning our rates, please do not hesitate to contact us.

With regards,



Linda Brifnek, CFO

Direct: 843.416.7087 | 800.743.DEPO | F: 866.390.DEPO
e: lbrifnek@scheduledepo.com | www.scheduledepo.com

A. William Roberts, Jr. & Associates | AWR Trial Solutions

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From: Cortney Botto
Sent: Thursday, May 07, 2015 4:41 PM
To: Linda Brifnek
Subject: FW: Transcription Requests: Sept 2014 jobs in <514 Jump Amusements-vs-Rangel, et al>

From: Patricia Thompson
Sent: Thursday, May 07, 2015 4:39 PM
To: Cortney Botto
Subject: RE: Transcription Requests: Sept 2014 jobs in <514 Jump Amusements-vs-Rangel, et al>

0915 - 144 pages.

0916 - 180 pages

0917 - 200 pages

0922 - 168 pages

0923 - 155 pages

0924 - 140 pages

0925 - 118 pages.

Have you heard from Whitsitt? does he want this transcribed? thanks

 **Credit_Card_Form.pdf**
923K

Wild Jumps <wildjumps@gmail.com>
To: Linda Brifnek <lbrifnek@scheduledepo.com>

Thu, May 7, 2015 at 11:51 PM

How did it go from 10,000 to 4400?
Was your other email quote incorrect for the \$9,000 figure?

Sent from my iPhone

On May 7, 2015, at 5:00 PM, Linda Brifnek <lbrifnek@scheduledepo.com> wrote:

Michael/Sarah,

The estimated cost for transcribing the below trials would be \$4400.00. The charge is \$3.95 per page for a sealed original and copy. These trials have not been transcribed so if you are ordering you would be responsible for paying for the original transcript. The \$3.95 per page is the cost for the original but because it would be sealed we provide another copy of the transcript for you to view. The shipping charges will depend on the weight of the package so that is why I am giving the estimate of \$4400.00.

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If you are interested in ordering the transcripts please fill out the attached credit card form.

If you have any further questions concerning our rates, please do not hesitate to contact us.

With regards,

<image001.png>

Linda Brifnek, CFO

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e: lbrifnek@scheduledepo.com | www.scheduledepo.com

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<image002.jpg> <image003.png>   

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From: Cortney Botto

Sent: Thursday, May 07, 2015 4:41 PM

To: Linda Brifnek

Subject: FW: Transcription Requests: Sept 2014 jobs in <514 Jump Amusements-vs-Rangel, et al>

From: Patricia Thompson

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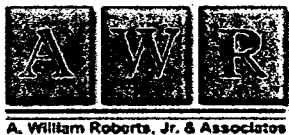
Have you heard from Whitsitt? does he want this transcribed? thanks

<Credit_Card_Form.pdf>

Linda Brifnek <lbrifnek@scheduledepo.com>
To: Wild Jumps <wildjumps@gmail.com>

Fri, May 8, 2015 at 8:05 AM

The reporter had originally given an estimate of 1000 pages for one transcript and 625 for another transcript. In checking with her again, what she had meant to say was about 1000 pages was her total page quote. These are all estimated pages. We will not know the final count until the transcripts are transcribed.



Linda Brifnek, CFO

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e: lbrifnek@scheduledepo.com | www.scheduledepo.com

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From: Wild Jumps [mailto:wildjumps@gmail.com]

Sent: Thursday, May 07, 2015 11:51 PM

To: Linda Brifnek

Subject: Re: Transcription Requests: Sept 2014 jobs in <514 Jump Amusements-vs-Rangel, et al>

[Quoted text hidden]

wild jumps <wildjumps@gmail.com>

Fri, May 8, 2015 at 9:30 AM

To: Linda Brifnek <lbrifnek@scheduledepo.com>

Thank whitsitt is not representing us. Thank you for getting back to us
Our money is tight as we are representing ourselves we are going to agree to dissolve paisleys LLC so we can represent ourselves. Can we please have the best quote as we only require the minimum for the transcript for court of appeals no fancy sealed just the minimum required by the court thank you!

[Quoted text hidden]

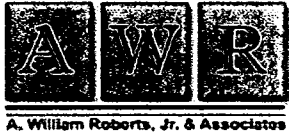
Linda Brifnek <lbrifnek@scheduledepo.com>

Fri, May 8, 2015 at 9:35 AM

To: wild jumps <wildjumps@gmail.com>

The quote that I provided below is the best quote. The sealed original is what is provided to the court, which you file with the court. There are no additional charges added onto the transcription fee except for the shipping, which we will not know until we weight the page. We actually quoted the lower rate from what some of the reporters charge for transcribing trials, which would be a technical rates.

If you know of any particular information that you are looking for in the trial, you may not have to have all of the days transcribed. That would definitely save you come money.



Linda Brifnek, CFO

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e: lbrifnek@scheduledepo.com | www.scheduledepo.com

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From: wild jumps [mailto:wildjumps@gmail.com]
Sent: Friday, May 08, 2015 9:31 AM
To: Linda Brifnek

[Quoted text hidden]

[Quoted text hidden]



wild jumps <wildjumps@gmail.com>

Fwd: Requested transcription of Trials taken for <514 Jump Amusements-vs-Rangel, et al> Sept, 2104

3 messages

Michael Whitsitt <mawhitsitt@gmail.com>
To: wild jumps <wildjumps@gmail.com>

Wed, May 6, 2015 at 2:13 PM

Here is the cost for the transcript. I don't really see a way for you to move forward with this. Also as we discussed I am putting in a motion to be relieved as counsel.

Respectfully,

----- Forwarded message -----

From: **Cortney Botto** <cbotto@scheduledepo.com>

Date: Wed, May 6, 2015 at 10:32 AM

Subject: RE: Requested transcription of Trials taken for <514 Jump Amusements-vs-Rangel, et al> Sept, 2104

To: "mawhitsitt@gmail.com" <mawhitsitt@gmail.com>

Attorney Whitsitt,

Good morning! We have finalized the estimated cost for your requested transcription, and it will be about \$9750.00 to transcribe all of the trial days. The days are estimated at the following page counts, charging \$3.95/page + shipping:

140915 (est. 144 pgs)

140916 (est. 180 pgs)

140917 (est. 200 pgs)

140922 (est. 627 pgs)

140923 (est 150 pgs)

140924 (est. 1000 pgs)

140925 (est. 117 pgs)

Please let me know which, if any, of the above-listed dates would like transcribed based on this estimate.

Thank you,



Cortney Botto, Administrative Assistant

Direct: 843.416.7088 P: 800.743.DEPO | F: 866.390.DEPO
e: cbotto@scheduledepo.com | www.scheduledepo.com

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From: mawhitsitt@gmail.com [mailto:mawhitsitt@gmail.com]

Sent: Tuesday, May 05, 2015 4:33 PM

To: Cortney Botto

Subject: Re: Requested transcription of Trials taken for <514 Jump Amusements-vs-Rangel, et al> Sept, 2104

Great. I am concerned my clients won't order the transcript. Hopefully that isn't the case.

Respectfully,

Michael A. Whitsitt, Attorney

The Whitsitt Law Firm

1476 Ben Sawyer Boulevard, Suite 3

Mount Pleasant, South Carolina 29464

(843)696-8904

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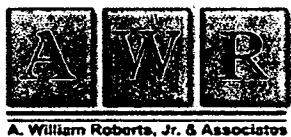
Sent from my IPHONE

On May 5, 2015, at 4:15 PM, Cortney Botto <cbotto@scheduledepo.com> wrote:

OK, will hold off on transcription.

Should have estimated costs to you by tomorrow- have all page estimates except for one in now!

Thanks again!



Cortney Botto, Administrative Assistant

Direct: 843.416.7088 P: 800.743.DEPO | F:
866.390.DEPO
e: cbotto@scheduledepo.com | www.scheduledepo.com

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<image002.jpg>   <image005.png><image006.png>

From: mawhitsitt@gmail.com [mailto:mawhitsitt@gmail.com]
Sent: Tuesday, May 05, 2015 4:13 PM
To: Cortney Botto
Subject: Re: Requested transcription of Trials taken for <514 Jump Amusements-vs-Rangel, et al> Sept, 2104

I would only need a paper copy. The court of appeals doesn't require a sealed transcript. Please do not proceed with transcription until my client has seen the estimate.

Respectfully,

Michael A. Whitsitt, Attorney

The Whitsitt Law Firm

1476 Ben Sawyer Boulevard, Suite 3

Mount Pleasant, South Carolina 29464

(843)696-8904

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Sent from my IPHONE

On May 5, 2015, at 3:41 PM, Cortney Botto <cbotto@scheduledepo.com> wrote:

Attorney Whitsitt,

Just wanted to check in and tell you the reporters are working on transcribing the below-listed trial dates, which we took in the above-referenced case back in September of last year:

9/15, 9/16, 9/17, 9/22, 9/23, 9/24, 9/25

Per your request I am still in the process of preparing an estimated cost for transcription of these, and will have that to you ASAP- I am just awaiting the last few page estimates from our reporters in order to do so – those outstanding should be in to me soon, along with ETA's of final product.

Just to confirm, you wanted the sealed original (since you are ordering transcription at this time) and a copy delivered via email? Or, did you wish to receive a paper copy of the transcripts in addition to the sealed originals? Also, the exhibits were returned to you via Fedex in October of last year when transcription was not ordered, so did you want to return those to us to be included in the sealed originals, or did you wish for the transcript to reflect that those exhibits were retained by you?

Just let me know, and I should have ETAs and cost estimates to you asap.

Thank you!!

<image001.png>

Cortney Botto, Administrative Assistant

Direct: 843.416.7088 P: 800.743.DEPO | F: 866.390.DEPO
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<image002.jpg>  <image004.png> <image005.png> <image006.png>

From: Cortney Botto
Sent: Friday, April 24, 2015 10:59 AM
To: 'mawhitsitt@gmail.com'
Subject: Requested transcription of Trails taken for <514 Jump Amusements-vs-Rangel, et al> Sept, 2104
Importance: High

Attorney Whitsitt,

Thank you for speaking with me by phone this morning!

Per your request, I am touching base now with the 2 reporters who took these during the trial in September of last year, and will be in touch soon with an ETA on when you would receive those from us. This will depend on the reporters' current workloads, and also if they are currently on depositions.

I will keep you informed as soon as I have information. Just let me know when you discern which exhibit you need and I will factor that into your cost estimate, which you also requested on the phone.

Thank you,

<image001.png>


**Cortney Botto, Administrative
Assistant**

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<image002.jpg>  <image004.png> <image005.png>
<image006.png>

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wild jumps <wildjumps@gmail.com>
To: Michael Whitsitt <mawhitsitt@gmail.com>

Wed, May 6, 2015 at 2:51 PM

Yes unfortunately that is just way too costly is it necessary to have that transcript or mandatory I order for us to represent ourselves
[Quoted text hidden]

Michael Whitsitt <mawhitsitt@gmail.com>
To: wild jumps <wildjumps@gmail.com>

Wed, May 6, 2015 at 3:10 PM

yes.
[Quoted text hidden]