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THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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SEP 24 2015

SC Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas
Paul M. Burch, Circuit Court Judge

Appellate Case No. 2015-001827

Erie Insurance Exchange.....Respondent.

v.

Government Employees Insurance Company, Mark Allison Scoggin and Angela Bennett Hill,
Defendants,

Of whom Government Employees Insurance Company is.....Appellant.

MOTION TO ORDER TRANSCRIPT

Pursuant to Rule 207 of the South Carolina Appellate Court Rules the Appellant, Government Employees Insurance Company ("GEICO"), respectfully requests permission to order the transcript from court reporter Kay H. Richardson outside of the filing deadlines set forth in Rule 207. In support of this Motion, Appellant GEICO would show that it has ordered a copy of the transcript from court reporter Kay H. Richardson on September 2, 2015. (See attached as Exhibit 1), but inadvertently failed to furnish a copy of said request to the Office of Court Administration and the clerk of this honorable Court.

September 22, 2015



EDWARD A. LOVE #75118
elove@kingandlove.com
KING, LOVE & HUPFER, LLC
PO Box 1764
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(843) 407-5525 - Tel
(843) 407-5782 - Fax
ATTORNEYS FOR APPELLANT

KING & LOVE

ATTORNEYS AT LAW

Robert T. King †*
Edward A. Love **
Charles J. Hupfer, Jr.
Ashley B. Nance

† CERTIFIED MEDIATOR
• ALSO ADMITTED IN NC
** ALSO ADMITTED IN GA

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King, Love & Hupfer, LLC
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PO Box 1764, Florence, SC 29503-1764

www.kingandlove.com

September 2, 2015

Ms. Kay H. Richardson
Post Office Box 282
Aynor, SC 29511

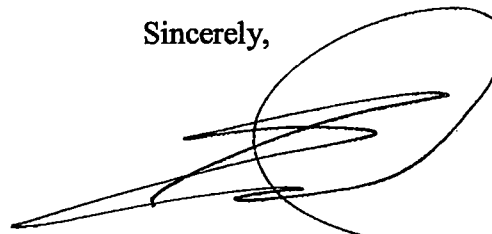
RE: Erie Insurance Exchange v. Government Employees Insurance Company,
Mark Allison Scoggin and Angela Bennett Hill
Docket No.: 2014-CP-26-06382
Our File No.: 41.01747

Dear Ms. Richardson:

On March 17, 2015, the above case was heard before the Honorable Paul M. Burch, Circuit Court Judge. My records indicate that you were the court reporter for this case. At this point, I request that you provide me with a transcript of the hearing. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Thank you. I am

Sincerely,

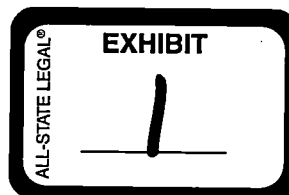


Edward A. Love
ELove@klslawfirm.com

EAL/wl

Enclosures

cc: J. Dwight Hudson, Esquire
Ian D. Maguire, Esquire



Ed Love

From: Richardson, Kay H. <KRichardson@sccourts.org>
Sent: Friday, September 11, 2015 5:11 PM
To: Ed Love
Subject: Erie Insurance Exchange v. Government Employees Insurance - 2014-CP-26-06382

Mr. Love,

I am in receipt of your request for the transcript of the hearing held on March 17, 2015. I have estimated the cost to be \$84.50 and will forward it to you as quickly as possible.

Thank you,

Kay H. Richardson

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

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Of whom Government Employees Insurance Company is.....Appellant.

PROOF OF SERVICE

I, the undersigned, as an attorney for Appellant, do hereby certify that I have served the *Motion to Order Transcript* this 22<sup>nd</sup> day of September, 2015 upon counsel of record by depositing the same in a U.S. Postal Box in an envelope, sufficient postage prepaid, properly addressed as follows:

J. Dwight Hudson, Esquire  
Hudson Law Offices  
1203 48<sup>th</sup> Avenue North, Suite 111  
Myrtle Beach, SC 29577

Ian D. Maguire, Esquire  
Maguire Law Firm  
1600 Oak Street, Suite B  
Myrtle Beach, SC 29577



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ATTORNEY FOR APPELLANT

# KING & LOVE

## ATTORNEYS AT LAW

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Jenny Abbott Kitchings, Clerk  
South Carolina Court of Appeals  
Post Office Box 11629  
Columbia, SC 29211

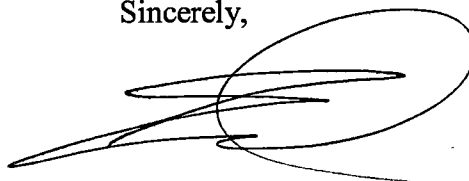
RE: Erie Insurance Exchange v. Government Employees Insurance Company,  
Mark Allison Scoggin and Angela Bennett Hill  
Docket No.: 2014-CP-26-06382  
Our File No.: 41.01747

Dear Ms. Kitchings:

Please find enclosed the original and six copies of a Motion to Order Transcript on behalf of Government Employees Insurance Company along with the Proof of Service in regards to the above matter. Please return a clocked copy to us in the enclosed envelope.

By copy of this letter to all counsel of record, we are herewith serving them with this Motion to Order Transcript.

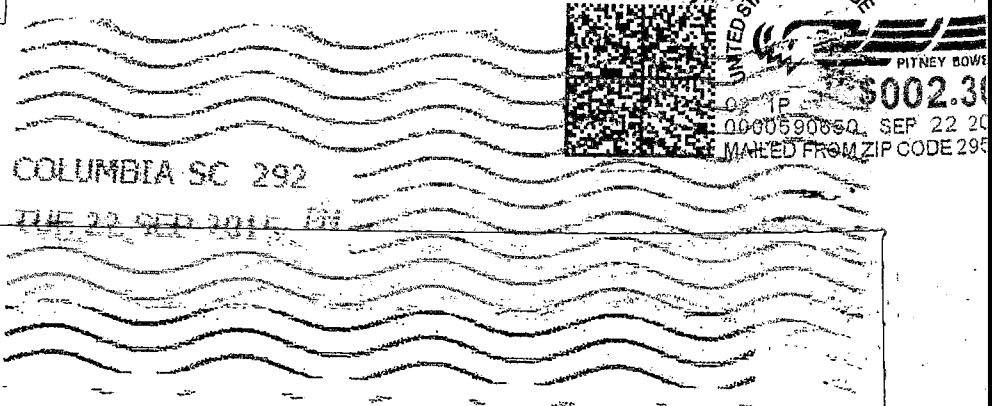
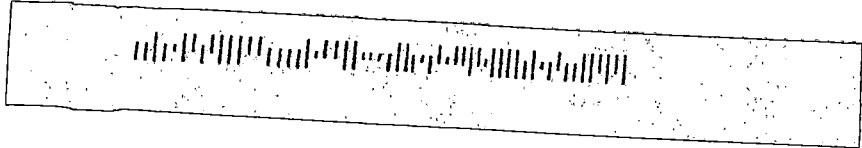
Sincerely,



Edward A. Love  
[ELove@kingandlove.com](mailto:ELove@kingandlove.com)

EAL/wl  
Enclosures

cc: J. Dwight Hudson, Esquire  
Ian D. Maguire, Esquire  
Ms. Britney Holloway  
Claim No.: 0315647190101020



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LOVE**  
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