

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Robert Hood, Circuit Court Judge

Appellate Case No.: 2015-001754

James Chaffin and Marietta Chaffin,

Appellants,

v.

Richland County Sheriffs Department,
Deputy Brian Metz, Investigator Roy
Livingston, Tallie and Devra Lackey,
Individually and as the parents to the
Minor child,

Respondents.

PETITION TO REQUEST TRANSCRIPT OUT OF TIME

COMES NOW, Aimee Zmroczek, and requests leave to order the transcript of the above referenced matter out of time. In support of this petition, counsel would submit the following information:

I. An appeal was filed for the above captioned Appellants with proof of service of the Notice of Appeal dated

II. Due to inadvertence the transcript was not requested in a timely manner.

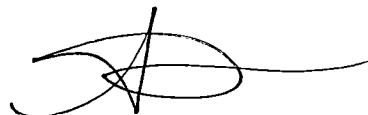
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SEP 24 2015

SC Court of Appeals

THEREFORE, due to no fault of the appellant, I would respectfully request leave in which to order the transcript out of time.

Respectfully submitted,



Aimee J. Zmroczek, Esq.
P.O. Box 11961
Columbia, South Carolina 29211
Telephone: 803-400-1918
Fax: 803-403-8005
ajzlawfirm@gmail.com
Attorney for Appellants

This 2~~7~~⁶th day of September, 2015

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PROOF OF SERVICE

I certify that I have served a copy of the Petition to Request Transcript Out of Time in the above entitled case on counsel of record and Roy Livingston by depositing a copy of it in the United States Mail, postage prepaid, on September 22, 2015, addressed as follows:

Derek Shoemake
John Warren, III
Simmons Law Firm
1711 Pickens Street
Columbia, SC 29201

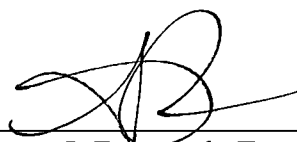
Roy Livingston
c/o Richland County Sheriff's Department
5623 Two Notch Road
Columbia, SC 29223

Robert Garfield
Davidson & Lindeman
PO Box 8568
Columbia, SC 29202

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September ~~29~~⁴, 2015

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Aimee J. Zmroczek, Attorney
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Christina Metze, paralegal
christina@ajzlawfirm.com

September 2nd, 2015

Court Administration
1220 Senate Street, Suite 200
Columbia, SC 29201

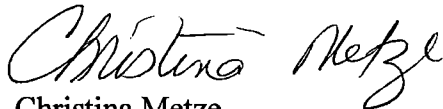
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RE: Transcript Request
James Chaffin & Marietta Chaffin v. Richland County Sheriff's Dept., et al.
Civil Action # 2014-CP-40-2209

Dear Sir or Madam:

On July 21, 2014 there was a hearing on two Motions to Dismiss before Judge Hood at the Richland County Courthouse in the above referenced matter. Wendy Derrick was the court reporter for that hearing, however, I see that she is no longer listed online as an active court reporter. I would like to request a copy of that hearing transcript.

Sincerely,



Christina Metze
Paralegal

A. J. Z. Law Firm, LLC

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Christina Metze, paralegal
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September 2~~3~~, 2015

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SC Court of Appeals

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

RE: James Chaffin v. Richland County Sheriff's Dept.
Appellate Case No.: 2015-001754

Dear Madam Clerk:

Enclosed please find an original and copy of a Motion to Request Transcript Out of Time for filing in the above referenced matter. Please file stamp the original and return the clocked copy in the self-addressed stamped envelope.

Sincerely,



Christina Metze
Paralegal

Enclosures

cc: Derek Alan Shoemake, Esq.
Robert David Garfield, Esq.
John Lafitte Warren, III, Esq.