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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

**RECEIVED**

Roger L. Couch, Circuit Court Judge

NOV 02 2015

SC Court of Appeals

Case No. 2014-CP-10-4445

Jacob Greenspan,

Plaintiff/Appellant,

v.

Brothers Property  
Corporation; Brothers  
Property Management  
Corporation; Victor Fuller,  
Individually, and in his  
official capacity; Ana Reina,  
Individually, and in her  
official capacity; and Oliver  
Rooskens, Individually, and in  
his official capacity,

Defendants,

Of whom Brothers Property  
Corporation, and Brothers  
Property Management  
Corporation are

Appellees.

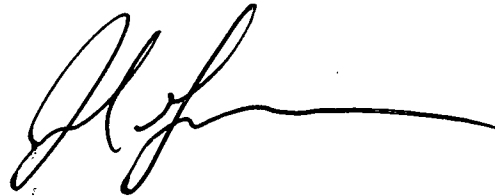
MOTION TO ORDER THE TRANSCRIPT OUTSIDE OF THE FILING DEADLINES

Appellant Jacob Greenspan, proceeding pro se, respectfully moves this Court to set aside the requirement that Appellant order the transcript of the proceedings from the court reporter along with the requirement that Appellant contemporaneously furnish all correspondence with the court reporter within the filing deadlines set forth by Rule 207, SCACR, and to accept for eventual inclusion in the Record on Appeal, the provided correspondence with the court reporter furnished

to him by Appellees' counsel of record, dated October 8, 2015, along with the provided transcript of the entire proceedings ordered and furnished to him by Appellees' counsel of record, as dated October 21, 2015.

This Motion is being submitted in response to the letter received by Appellant from the Clerk of Court for The South Carolina Court of Appeals, dated October 19, 2015.

WHEREFORE, Appellant respectfully requests that the Court grant this Motion to avoid the duplication of efforts that would be necessary for Plaintiff to meet the requirements set forth by Rule 207, SCACR.



October 29, 2015

Jacob Greenspan  
550 Harbor Cove Lane, #15H  
Charleston, SC 29412  
(843) 647-9277  
Appellant, Pro Se

Other Counsel of Record:  
Wendy L. Furhang (Fed. I.D. No. 9851)  
Email: furhangw@jacksonlewis.com  
John W. Sulau (Fed. I.D. No. 11613)  
John.Sulau@jacksonlewis.com

JACKSON LEWIS P.C.  
15 South Main Street, Suite 700  
Greenville, SC 29601  
Phone: 864-232-7000  
Fax: 864-235-1381

ATTORNEYS FOR BROTHERS PROPERTY  
CORPORATION AND BROTHERS PROPERTY  
MANAGEMENT CORPORATION

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

Roger L. Couch, Circuit Court Judge

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Case No. 2014-CP-10-4445

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SC Court of Appeals

Jacob Greenspan

Plaintiff/Appellant

v.

Brothers Property  
Corporation; Brothers  
Property Management  
Corporation; Victor Fuller,  
Individually, and in his  
official capacity; Ana Reina,  
Individually, and in her  
official capacity; and Oliver  
Rooskens, Individually, and in  
his official capacity,

Defendants,

Of whom Brothers Property  
Corporation, and Brothers  
Property Management  
Corporation are

Appellees.

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PROOF OF SERVICE

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I certify that I have served the Motion to Order the Transcript Outside of the Filing Deadline on BROTHERS PROPERTY CORPORATION and BROTHERS PROPERTY MANAGEMENT CORPORATION by way of the United States Postal Service, Certified Mail, on October 29, 2015, addressed to the attorney of record, Wendy L. Furhang, JACKSON LEWIS P.C., 15 South Main St., Suite 700, Greenville, SC 29601.

October 29, 2015



Jacob Greenspan  
550 Harbor Cove Lane, #15H  
Charleston, SC 29412  
(843) 647-9277  
Appellant, Pro Se

Other Counsel of Record:

Wendy L. Furhang (Fed. I.D. No. 9851)

Email: [furhangw@jacksonlewis.com](mailto:furhangw@jacksonlewis.com)

John W. Sulau (Fed. I.D. No. 11613)

John.Sulau@jacksonlewis.com

JACKSON LEWIS P.C.

15 South Main Street, Suite 700

Greenville, SC 29601

Phone: 864-232-7000

Fax: 864-235-1381

ATTORNEYS FOR BROTHERS PROPERTY  
CORPORATION AND BROTHERS PROPERTY  
MANAGEMENT CORPORATION

October 29, 2015

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

RECEIVED

NOV 02 2015

SC Court of Appeals

RE: Jacob Greenspan, Plaintiff/Appellant, v. Brothers Property Corporation; Brothers Property Management Corporation, Victor Fuller, Individually, and in his official capacity; Ana Reina, Individually, and in her official capacity; and Oliver Rooskens, Individually, and in his official capacity, Defendants. Of whom Brothers Property Corporation, and Brothers Property Management Corporation are Appellees.  
Appellate Case No. 2015-002085

Dear Ms. Kitchings:

Enclosed for filing is a motion to order the transcript outside of the filing deadlines in response to the request received within the letter dated October 19, 2015, in the above case. Also enclosed are the following:

- (1) A copy of the letter showing that Appellees' counsel of record ordered the transcript directly from the court reporter on October 1, 2015, which was furnished to me along with the correspondence dated October 8, 2015.
- (2) A copy of the transcript of the entire proceedings ordered by Appellees' counsel of record, and furnished to me along with the correspondence dated October 21, 2015.
- (3) Proof of service of the motion to order the transcript outside of the filing deadlines on Appellees' on October 29, 2015.
- (4) The filing fee of \$25.

Sincerely,



Jacob Greenspan  
550 Harbor Cove Lane, #15H  
Charleston, South Carolina 29412  
(843) 647-9277  
Appellant, Pro Se

cc: South Carolina Office of Court Administration  
1220 Senate Street, Suite 201  
Columbia, SC 29201

cc: Wendy L. Furhang  
JACKSON LEWIS P.C.  
15 South Main Street, Suite 700  
Greenville, SC 29601  
Phone: 864-232-7000  
Attorney for Appellees'

Representing Management Exclusively in Workplace Law and Related Litigation

**jacksonlewis**  
Attorneys at Law

Jackson Lewis P.C.  
15 South Main Street  
Suite 700  
Greenville, South Carolina 29601  
Tel 864 232-7000  
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www.jacksonlewis.com

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| ATLANTA, GA      | HONOLULU, HI*      | NEW ORLEANS, LA     | RICHMOND, VA          |
| AUSTIN, TX       | HOUSTON, TX        | NEW YORK, NY        | SACRAMENTO, CA        |
| BAITIMORE, MD    | INDIANAPOLIS, IN   | NORFOLK, VA         | SALT LAKE CITY, UT    |
| BIRMINGHAM, AL   | JACKSONVILLE, FL   | OMAHA, NE           | SAN DIEGO, CA         |
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| DETROIT, MI      | MINNEAPOLIS, MN    | PROVIDENCE, RI      | WHITE PLAINS, NY      |
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\*through an affiliation with Jackson Lewis P.C., a Law Corporation

**RECEIVED**  
NOV 02 2015  
SC Court of Appeals

October 21, 2015

Jacob Greenspan  
550 Harbor Cove Lane  
Apt. 15H  
Charleston, SC 29412

Re: Jacob Greenspan v. Brothers Property  
Corporation, Brothers Property  
Management Corporation, et al.  
Civil Action No.: 2014-CP-1004445

Dear Mr. Greenspan:

Enclosed please find a copy of the transcript of the July 29 hearing in this case, received from the court reporter, Ms. Karen Anderson on Friday, October 16, 2015. Also enclosed an official copy of the exhibit presented at the same hearing.

Sincerely,

JACKSON LEWIS P.C.



John W. Sulau

JWS  
Enclosures



Attorneys at Law

Representing Management Exclusively in Workplace Law and Related Litigation

Jackson Lewis P.C.
15 South Main Street
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Greenville, South Carolina 29601
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Table listing various office locations across the United States, including Albany, NY; Albuquerque, NM; Atlanta, GA; Austin, TX; Baltimore, MD; Birmingham, AL; Boston, MA; Chicago, IL; Cincinnati, OH; Cleveland, OH; Dallas, TX; Dayton, OH; Denver, CO; Detroit, MI; Grand Rapids, MI; Greenville, SC; Hartford, CT; Honolulu, HI; Houston, TX; Indianapolis, IN; Jacksonville, FL; Kansas City Region; Las Vegas, NV; Long Island, NY; Los Angeles, CA; Memphis, TN; Miami, FL; Milwaukee, WI; Minneapolis, MN; Monmouth County, NJ; Morristown, NJ; New Orleans, LA; New York, NY; Norfolk, VA; Omaha, NE; Orange County, CA; Orlando, FL; Philadelphia, PA; Phoenix, AZ; Pittsburgh, PA; Portland, OR; Portsmouth, NH; Providence, RI; Raleigh, NC; Rapid City, SD; Richmond, VA; Sacramento, CA; Salt Lake City, UT; San Diego, CA; San Francisco, CA; San Juan, PR; Seattle, WA; St. Louis, MO; Stamford, CT; Tampa, FL; Washington, DC Region; White Plains, NY.

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October 8, 2015

NOV 02 2015
SC Court of Appeals

Jacob Greenspan
550 Harbor Cove Lane
Apt. 15H
Charleston, SC 29412

Re: Jacob Greenspan v. Brothers Property
Corporation, Brothers Property
Management Corporation, et al.
Civil Action No.: 2014-CP-1004445

Dear Mr. Greenspan:

Enclosed please find a copy of our October 1 correspondence to Ms. Karen Anderson, the court reporter who prepared the transcript of the July 29 hearing in this case, requesting a copy of the hearing transcript. We will provide you with a copy of the transcript upon receipt.

Sincerely,

JACKSON LEWIS P.C.

[Handwritten signature]

John W. Sulau

JWS
Enclosures

Representing Management Exclusively in Workplace Law and Related Litigation

**Jackson Lewis**  
Attorneys at Law

Jackson Lewis P.C.  
15 South Main Street  
Suite 700  
Greenville, South Carolina 29001  
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October 1, 2015

Ms. Karen Andersen  
186 Seven Farms Drive  
Suite 206  
Daniel Island, SC 29492

Re: Jacob Greenspan v. Brothers Property  
Corporation, Brothers Property  
Management Corporation, et al.  
Civil Action No.: 2014-CP-1004445

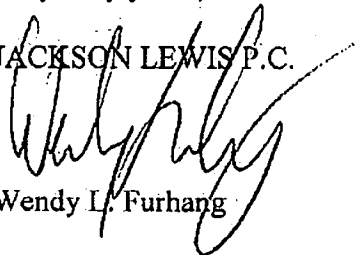
Dear Ms. Andersen:

This firm represents Defendant Brothers Property Management Corporation in the above-referenced matter. Please accept this letter as a request for a transcript of the hearing held in this matter on July 29, 2015, before The Honorable Judge Roger L. Couch.

We will accept and process an invoice for reasonable and customary copying and mailing charges. Please contact me should you have any questions.

Very truly yours,

JACKSON LEWIS P.C.

  
Wendy L. Furhang

WLF/amm  
Enclosures