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THE STATE OF SOUTH CAROLINA

In the Court of Appeals

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JAN 15 2016

SC Court of Appeals

APPEAL FROM LANCASTER COUNTY

Court of Common Pleas

DeAndrea G. Benjamin, Circuit Court Judge

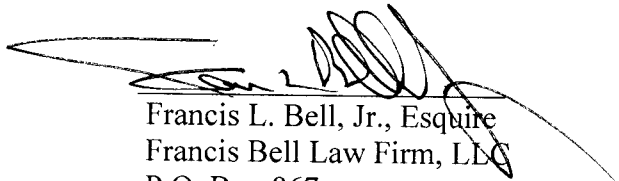
Appellate Case No. 2015-002524

Josh Hammond ..... Respondent,  
 v.  
 Richard Tod Hammond..... Appellant,  
 v.  
 Titan Logging, LLC.....Third-Party Defendant.

MOTION TO ALLOW APPELLANT'S TRANSCRIPT REQUEST

The undersigned counsel for the Respondents hereby moves the Court for an Order allowing the Appellant to order the Transcript of Proceeding outside of the filing deadlines set by South Carolina Appellate Court Rule 207.

January 14, 2016



Francis L. Bell, Jr., Esquire  
Francis Bell Law Firm, LLC  
P.O. Box 867  
Lancaster, SC 29721  
(803) 283-8476  
Attorney for Appellant  
SC Bar No. 627

Other Counsel of Record:  
Stephen L. Goldfinch, Jr.  
Ryan P. Compton  
Post Office Box 829  
Murrells Inlet, SC 29576  
(843) 357- 9301  
Attorneys for Respondent

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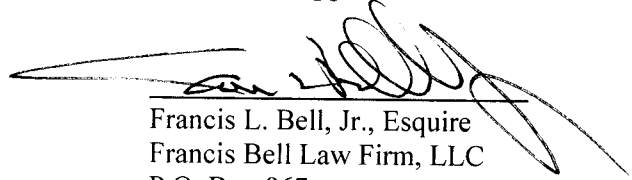
MEMORANDUM IN SUPPORT OF APPELLANT’S MOTION

COMES NOW Appellant Richard Tod Hammond, by and through his counsel, and submits this Memorandum in Support of his Motion.

Appellant moves the Court for an Order allowing the Appellant to order the Transcript of Proceeding outside the filing deadline set by South Carolina Appellant Court Rule 207. Appellant filed and served their Notice of Appeal on December 4, 2015. A request for the Transcript of Proceeding was submitted to the court reporter with copies to the Court and Respondent attorneys on December 18, 2015. The request ordering the Transcript of record was

inadvertently outside of the ten days allowed by South Carolina Appellant Court Rule 207.  
Appellant requests the Court for an Order allowing the original request for the Transcript of  
Record be allowed outside of the filing deadline set by South Carolina Appellant Court Rule 207.

January 14, 2016



Francis L. Bell, Jr., Esquire  
Francis Bell Law Firm, LLC  
P.O. Box 867  
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(803) 283-8476  
Attorney for Appellant  
SC Bar No. 627

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Richard Tod Hammond, ..... Appellant,

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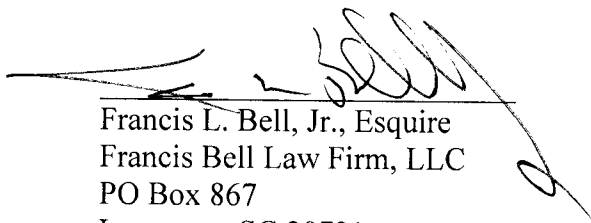
Titan Logging, LLC, ..... Third-Party Defendant

**PROOF OF SERVICE**

I certify that I have served the *Motion to Allow Appellant's Transcript Request and Memorandum in Support of Appellant's Motion* on Respondent by depositing a copy of it in the United States Mail, postage prepaid, addressed to attorney of record:

Stephen L. Goldfinch  
Goldfinch Winslow  
PO Box 829  
Murrells Inlet, SC 29576

I further certify that all parties required by Rule to be served have been served, this 14<sup>th</sup> day of January, 2016.



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Lancaster, SC 29721  
(803) 283-8476  
Attorney for Appellant  
SC Bar No. 627

# FRANCIS BELL LAW FIRM, LLC

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D. GLENN YARBOROUGH  
(1919-1979)

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SC Court of Appeals

January 14, 2016

The Honorable Jenny Abbott Kitchings  
Clerk, South Carolina Court of Appeals  
1220 Senate Street  
Columbia, SC 29201

**Re: Josh Hammond v. Richard Tod Hammond v. Titan Logging, LLC  
Appellate Case No. 2015-002524**

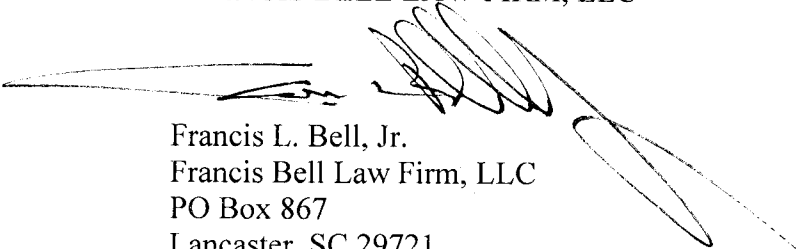
Dear Madam Clerk:

Enclosed for filing in the above matter are the original + six copies of *Motion To Allow Appellant's Transcript Request and Memorandum In Support Of Appellant's Motion, together with Proof of Service on Respondent's attorney of record*. By copy of this letter, the enclosures are being served upon other counsel. Please return clocked copies of the documents in the envelope provided.

Also enclosed is my firm's check for the Motion filing fee of \$25.00.

Very truly yours,

FRANCIS BELL LAW FIRM, LLC

  
Francis L. Bell, Jr.  
Francis Bell Law Firm, LLC  
PO Box 867  
Lancaster, SC 29721  
(803)283-8476  
Attorney for Appellant  
SC Bar No. 00627

cc: Stephen L. Goldfinch(w/encs.)

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FRANCIS BELL LAW FIRM, LLC  
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LANCASTER, SC 29720  
UNITED STATES US

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TO HONORABLE JENNY ABBOTT KITCHINGS  
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1220 SENATE STREET

COLUMBIA SC 29201

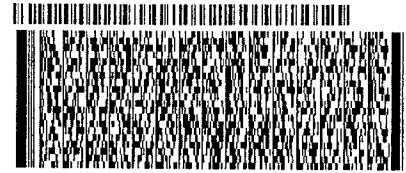
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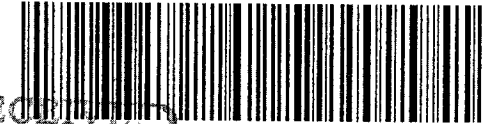
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