

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

Case No. 2015-CP-10-3689

RECEIVED

JAN 29 2016

SC Court of Appeals

Save Shem Creek,  
Corporation

Appellant

v.

The Town of Mount Pleasant,  
and Shem Creek Development  
Group, LLC

Respondents.

Motion

The undersigned hereby requests permission to file the written arrangements with the court reporter for furnishing the transcript of proceedings, attached hereto as Exhibit A, outside the filing deadlines, set by Rule 207, South Carolina Appellate Court Rules.

January 26, 2016

THE RICHTER FIRM, LLC

By: 

Lawrence E. Richter, Jr.

Aaron E. Edwards

622 Johnnie Dodds Blvd.

Mt. Pleasant, SC 29464

P: (843) 849-6000

F: (843) 881-1400

Other Counsel of Record:

Julia P. Copeland  
David G. Pagliarini  
#18 North Adgers Wharf  
Charleston, SC 29401  
843-577-7455

ATTORNEYS FOR DEFENDANT THE TOWN OF MOUNT PLEASANT

G. Hamlin O'Kelley  
Buist, Byars, & Taylor  
652 Coleman Blvd., Ste. 200  
Mt. Pleasant, SC 29464

ATTORNEYS FOR DEFENDANT SHEM CREEK DEVELOPMENT GROUP, LLC

**THE RICHTER FIRM, LLC**

*Attorneys & Counselors at Law*  
622 Johnnie Dodds Boulevard  
Mount Pleasant, South Carolina 29464

Lawrence F. Richter, Jr.  
Aaron E. Edwards

Telephone: (843) 849-6000  
Telefax: (843) 881-1400

January 7, 2016

Sharon L. Vizer  
PO Box 1413  
Johns Island, SC 29457

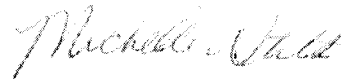
In Re: Save Shem Creek, Corporation v. Town of Mt. Pleasant  
Case No.: 2015-CP-10-3689

Dear Ms. Vizer:

Please consider this our request for a copy of the transcript from the November 13, 2015 hearing before The Honorable J.C. Nicholson, Jr. in the above referenced matter. I would appreciate you contacting me as soon as the transcript is available so we may make arrangements to get it from you. If you are able to send an electronic copy to my email address, [michelle@richterfirm.com](mailto:michelle@richterfirm.com), that would be most appreciated.

Thanking you for your kind assistance, I am

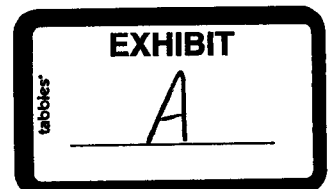
Very truly yours,



Michelle Stith

/ems

cc: Save Shem Creek



## Michelle Stith

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**From:** Michelle Stith <Michelle@RichterFirm.com>  
**Sent:** Thursday, January 14, 2016 11:52 AM  
**To:** 'Vizer, Sharon L.'  
**Cc:** Aaron Edwards (Aaron@RichterFirm.com); 'Larkin Hegler'  
**Subject:** RE: Save Shem Creek vs. Town of MP

I double checked and he only wants the paper copy. Thank you.  
Michelle

-----Original Message-----

From: Vizer, Sharon L. [<mailto:SVizer@sccourts.org>]  
Sent: Thursday, January 14, 2016 11:36 AM  
To: Michelle Stith  
Subject: RE: Save Shem Creek vs. Town of MP

Ok. no problem. I will send out the hard copy tomorrow.  
He doesn't want the electronic copy at all, right?

Regards,

Sharon L. Vizer

Circuit Court Reporter

Ninth Judicial Circuit

PO Box 1413

Johns Island, SC 29457

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From: Michelle Stith <[Michelle@RichterFirm.com](mailto:Michelle@RichterFirm.com)>  
Sent: Thursday, January 14, 2016 9:47 AM  
To: Vizer, Sharon L.  
Cc: Aaron Edwards; 'Larkin Hegler'  
Subject: RE: Save Shem Creek vs. Town of MP

Ms. Vizer,

I am sorry for the delayed response but I have been out of town and returned to the office today. Mr. Edwards said that we need a hard copy. Thank you for your help.

Michelle Stith  
The Richter Firm, LLC

-----Original Message-----

From: Vizer, Sharon L. [<mailto:SVizer@sccourts.org>]  
Sent: Monday, January 11, 2016 9:36 AM

To: [michelle@richterfirm.com](mailto:michelle@richterfirm.com)

Subject: Save Shem Creek vs. Town of MP

Hi Michelle,

I received your request for a transcript from the November 13, 2015 hearing.

Do you need a hard copy of just an electronic copy? I can send you an electronic copy for \$35. If you also want a hard copy the total will be \$46.25. I can send the electronic copy today but the hard copy will have to be mailed tomorrow.

Regards,

Sharon L. Vizer

Circuit Court Reporter

Ninth Judicial Circuit

PO Box 1413

Johns Island, SC 29457

~~~ 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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THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

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APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

J.C. Nicholson, Jr., Circuit Court Judge

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Case No. 2015-CP-10-3689

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Save Shem Creek,  
Corporation

Appellant

v.

The Town of Mount Pleasant,  
and Shem Creek Development  
Group, LLC

Respondents.

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PROOF OF SERVICE

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I certify that I have served the Motion requesting permission to order the transcript on The Town of Mount Pleasant and Shem Creek Development Group by depositing a copy of it in the United States Mail, postage prepaid, on January 26, 2016, addressed to each of their attorneys of record as follows:

Julia P. Copeland  
David G. Pagliarini  
#18 North Adgers Wharf  
Charleston, SC 29401  
843-577-7455  
*ATTORNEYS FOR DEFENDANT*  
*THE TOWN OF MOUNT PLEASANT*

G. Hamlin O'Kelley  
Buist, Byars, & Taylor  
652 Coleman Blvd., Ste. 200  
Mt. Pleasant, SC 29464

*ATTORNEYS FOR DEFENDANT  
SHEM CREEK DEVELOPMENT GROUP, LLC*

THE RICHTER FIRM, LLC

By: 

Lawrence E. Richter, Jr.

Aaron E. Edwards

622 Johnnie Dodds Blvd.

Mt. Pleasant, SC 29464

P: (843) 849-6000

F: (843) 881-1400

Dated: January 26, 2016  
Mt. Pleasant, South Carolina

**THE RICHTER FIRM, LLC**

*Attorneys & Counselors at Law*  
622 Johnnie Dodds Boulevard  
Mount Pleasant, South Carolina 29464

Lawrence E. Richter, Jr.  
Aaron E. Edwards

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Telephone: (843) 849-6000  
Telefax: (843) 881-1400

January 26, 2016

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

78540  
RECEIVED  
JAN 29 2016  
SC COURT OF APPEALS

In Re: Save Shem Creek, Corporation v. Town of Mt. Pleasant and  
Shem Creek Development Group, LLC  
Case No.: 2015-CP-10-3689

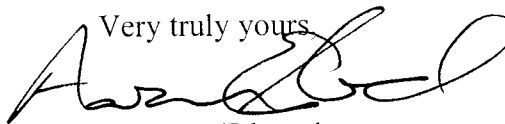
Dear Madam Clerk:

Per the Court's request, enclosed please find a Motion requesting permission to file the letter ordering the transcript outside the filing deadlines set by Rule 207, South Carolina Appellate Court Rules.. By copy of this letter to Julia P. Copeland, David G. Pagliarini, and G. Hamlin O'Kelley, attorneys for the Respondents, I am serving them with a copy of the same.

If you have any questions or require additional information, please do not hesitate to contact me.

Thanking you for your kind assistance, I am

Very truly yours



Aaron E. Edwards

AEE/cms  
Enclosures

cc: Julia P. Copeland  
David G. Pagliarini  
G. Hamlin O'Kelley

**THE RICHTER FIRM, LLC**

*Attorneys & Counselors at Law*

622 Johnnie Dodds Boulevard  
Mount Pleasant, South Carolina 29464

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**RECEIVED**

JAN 27 2016

SC Court of Appeals

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

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