

Law Offices of
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Robert D. Dodson,
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Also Licensed in N.C.



Telephone: 803.252.2600

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APR 07 2016

SC Court of Appeals

April 7, 2016

WRITTEN REQUEST FOR TRANSCRIPT FOR APPEAL PURPOSES

Fifth Circuit Court Reporters

Elizabeth B. Harris
414 Autumn Circle
Columbia, SC 29206

Crystal M. Holmes
Post Office Box 611
Columbia, SC 29202

Bonnie H. Kelly
Post Office Box 50614
Columbia, SC 29250-0614

Deborah M. McCurdy
1403 Geiger Avenue
Columbia, SC 29201-1713

Keshia T. Reed
Post Office Box 12190
Florence, SC 29504-2190


Karen E. Ambroziak
1083 Langford Road
Blythewood, SC 29016

RE: Do Yeun Kim vs. County of Richland, Richland County Sheriff's Department and
Leon Lott in his Official Capacity as Richland County Sheriff
Request for Transcript from trial held January 20-21, 2016
Civil Acton No: 2014-CP-40-6297

Dear Madam Court Reporters:

The above referenced matter was tried in Richland County, SC on January 20-21, 2016 before the Honorable Doyet A. Early. Please accept this letter as our firm's formal written request that a transcript of the trial proceedings be ordered. A courtesy copy of the Notice of Appeal is enclosed for your reference. Thank you in advance for your assistance. If you have any questions or concerns, please feel free to contact me at 803-252-2600 or lprotopapas@rdodsonlaw.com. With best regards I am,

Sincerely yours,


Lindsay H.V. Protopapas
Paralegal to Robert Dodson

cc: Robert Garfield and Todd Flippin

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Doyet A. Early, Circuit Court Judge

Case No. 2014-CP-40-6297

Do Yeon Kim, v. Appellant,
County of Richland, Richland County Respondents.
Sheriff's Department and Leon Lott in his
Official Capacity as Richland County
Sherriff.

NOTICE OF APPEAL

Do Yeon Kim appeals the following rulings and Orders of the Honorable Doyet A. Early from a trial held on January 20 and 21, 2016:

- Ruling at trial to exclude one of Plaintiff's witnesses who was previously disclosed in discovery and with whom Defense Counsel had spoken with the week before trial on the ground that the witness was not timely disclosed in discovery;
- Ruling at trial to allow the testimony of Leon Lott when Leon Lott was never disclosed as a witness prior to trial;
- Ruling at trial to exclude some of Plaintiff's medical bills/receipts;
- Ruling at trial to exclude written evidence (TR-310 accident report) that should not have been excluded based on applicable statutory law and the applicable Rules of Evidence;
- Ruling at trial denying Plaintiff's Motion for a directed verdict on liability;
- Ruling at trial and charge to the jury on application of S.C. Code Ann 56-5-760 when the evidence at trial did not support charging the jury on this code section.

This appeal is also taken from the written Order by the Honorable Doyet A. Early dated March 7, 2016 which granted in part and denied in part appellant's post trial motions (Notice of Motion and Motion for New Trial Nisi Additur or in the Alternative Judgment Notwithstanding


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SC Court of Appeals

the Verdict or in the Alternative a New Trial; Motion for Costs and Translator's Fees). Appellant received written notice of entry of the Order on March 9, 2016.

April 5, 2016


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Attorney for Appellant

Other Counsel for *Respondents*:

Robert Garfield, Esquire
Todd Flippin, Esquire
Davidson & Lindemann, PA
1611 Devonshire Drive, 2nd Floor
Post Office Box 8568
Columbia, SC 29202

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

Doyet A. Early, Circuit Court Judge

Case No. 2014-CP-40-6297

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SC Court of Appeals

County of Richland, Richland County Sheriff's Department and Leon Lott in his Official
Capacity as Richland County Sheriff..... Respondents

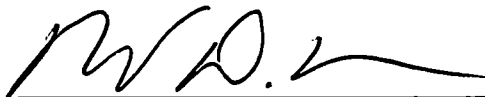
v.

Do Yeon Kim..... Appellant

PROOF OF SERVICE

I certify that I have served the Written Request for Transcript by depositing a copy of it in the
United States Mail, postage prepaid, on April 6, 2016, addressed to their attorneys of record,
Robert Garfield and Todd Flippin of Davidson & Lindemann, PA at Post Office Box 8658,
Columbia, South Carolina 29202.

April 7, 2016



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Attorney for Appellant

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April 7, 2016

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SC Court of Appeals

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

RE: Do Yeon Kim v. County of Richland, Richland County Sheriff's Department and
Leon Lott in his Official Capacity as Richland County Sheriff, Case No. 2014-
CP-40-6297

Dear Ms. Kitchings:

Enclosed for filing in the above referenced matter is two (2) copies of Appellants formal written request for transcript which has been ordered from the Fifth Circuit (Richland County) Court Reporter(s), as well as a Proof of Service indicating service of same upon Respondents counsel. I would appreciate your returning a clocked copy to my office via my courier. If you have any questions or concerns, please do not hesitate to contact me. With best regards I am,

April 7, 2016

A handwritten signature in black ink, appearing to read "R.D. Dodson", written over a horizontal line.

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Attorney for Appellant

cc: Other Counsel of Record:
Robert Garfield, Esquire & Todd Flippin, Esquire
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Post Office Box 8568
Columbia, SC 29202
Attorneys for Respondents