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STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

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APPEAL FROM THE FIFTH JUDICIAL CIRCUIT  
Honorable Alison Renee Lee, Presiding

APR 13 2016

SC Court of Appeals

Case No. 2014-CP-40-07011

Crystal Faye Clark .....Appellant,

V.

Housing Authority of the City of Columbia.....Respondent

**NOTICE OF MOTION AND MOTION TO ORDER  
TRANSCRIPT OUTSIDE OF THE FILING DEADLINES**

TO: THE RESPONDENT, ABOVE-NAMED:

PLEASE TAKE NOTICE that the above-named Appellant, Crystal Faye Clark, by and through her attorney, undersigned, will move before the Presiding Judge of the South Carolina Court of Appeals, on the 10<sup>th</sup> day hereafter, or as soon as this matter may be heard, for an order allowing her to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules based on the statutory and common laws of this state, the South Carolina Rules of Appellate Procedure and the following facts:

1. The Appellant, Crystal Faye Clark, is indigent and resided in the an apartment at Allen-Benedict Court provided by the Respondent where her injury allegedly occurred.
2. The Appellant's deposition was taken by the Respondent and she as not been able to pay the \$362.95 for a copy of the transcript of her deposition. I therefore argued against the Respondent's summary judgment motion without the benefit of a copy of the deposition

transcript.

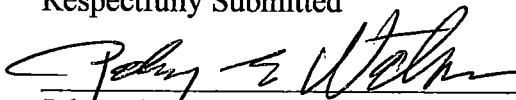
3. The Appellant has also not been able to put forth any money for a copy of the transcript from the summary judgment hearing but the Respondent's attorney has indicated that he would provide a copy of that transcript free of charge when he procures it. However, I have requested a copy of the transcript from the Court Reporter to satisfy the requirements of this motion (copy attached).

4. The Appellant has also not been able to pay any of the costs involved in this appeal so I have advanced those costs.

5. I believe that the Appellant's appeal is meritorious.

Respectfully Submitted

By:



Johnny E. Watson, Sr., Esquire

Watson Law Firm

Post Office Box 2305

2715 Edgewood Drive

Post Office Box 2305 (29202)

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(803) 400-1600 Phone

(803) 400-1200 Fax

*Counsel for Appellant*

*Columbia, South Carolina*

*Dated: April 13, 2016*

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APR 13 2016

SC Court of Appeals

April 13, 2016

Karen E. Ambroziak  
1083 Langford Road  
Blythewood, SC 29016

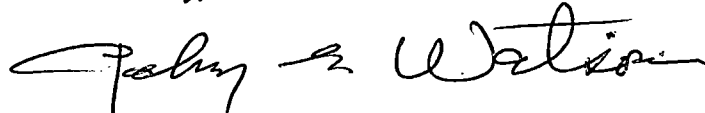
Re: Crystal Faye Clark v. Housing Authority of The City of Columbia  
C.A. No.: 2014-CP-40-07011

Dear Ms. Ambroziak:

This letter is to request the hearing transcript regarding the above-referenced matter, for a hearing before the Honorable Alison Renee Lee on October 22, 2015. Please advise as to the cost to obtain a copy of a transcript for a summary judgment hearing.

Should you have any questions, please feel free to contact our office.

Sincerely,



Johnny E. Watson, Sr.

Enclosure

cc: Jonny Abbott Kitchings, Clerk, SC Court of Appeals  
Kenneth A. Davis, Esq.

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**SC Court of Appeals**

CERTIFICATE OF SERVICE

I, Johnny E. Watson, of 2715 Edgewood Avenue (29204), P.O. Box 2305, Columbia, South Carolina 29202, hereby certified that I have served the individual named below with a copy of the document described herein by depositing the documents in the United States mail, postage prepaid and sent the same to them at the addresses listed herein below:

PERSON SERVED: Attorney Kenneth A. Davis  
Boykin, Davis & Smiley, LLC  
220 Stoneride drive, Suite 100  
P. O. Box 11844  
Columbia, South Carolina 29211-1844

DOCUMENTS SERVED: 1. **NOTICE OF MOTION AND MOTION TO ORDER TRANSCRIPT OUTSIDE OF THE FILING DEADLINES and the**

2. **CERTIFICATE OF SERVICE**  
  
Documents Server, Johnny E. Watson

Columbia, South Carolina  
Date: April 13, 2016

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## FACSIMILE COVER SHEET

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SC Court of Appeals

FAX NUMBER TRANSMITTED TO: 803-400-1200

To: Johnny Watson, Esq.

Of: Watson Law Firm

From: Kiara Lewis

Client/Matter: Crystal Faye Clark v. Housing Authority of The City of Columbia

Date: April 13, 2016

Number of pages including cover: 2

### COMMENTS:

**We are currently waiting to hear from the court reporter regarding the amount for the transcripts but we will call back if/ when we hear back from her. Thank you.**

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