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STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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APR 14 2016

SC Court of Appeals

APPEAL FROM THE SOUTH CAROLINA ADMINISTRATIVE LAW COURT
Honorable Deborah Brooks Durden, Judge

Appellate Case No. 2016-000238

SCDHEC Respondent,

v.

Robin's Residential Care Facility..... Appellant

**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, Robin's Residential Care Facility, by and through her attorney, undersigned, will move before the Presiding Judge of the South Carolina Court of Appeals, on the 10th 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, Robin's Residential Care Facility, by and through its owner and sole employee, Lillian Jamison, has not been able to afford the cost of the transcript in her case before now.
2. The cost of her copy of the transcript is \$1,171.50 from the Creel Reporting Agency.
3. The Appellant asserts that she has not been able to afford the transcript due her loss of

patients because of the Responennt's actions in this case which resulted in her losing clients.

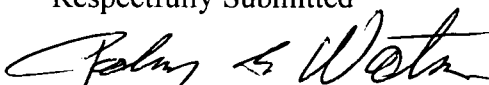
4. The Supreme Court of this State makes the transcript debt the debt of the attorney requesting the transcript so it is my practice to require payment for the transcript before I order the transcript. The transcript reporting companies are aware of the position of the Supreme Court and some will readily file an ethics complaints against the attorney if the bill is not promptly paid.

5. The Appellant has now provided the money for a copy of the transcript.

6. I believe that the Appellant's appeal is meritorious and the State is not prejudiced by the delay.

Wherefore, the Appellant respectfully request she be allowed to request the trancript at this time and the appeal schedule be adjusted accordingly.

Respectfully Submitted

By: 


Johnny E. Watson, Sr., Esquire
Watson Law Firm
Post Office Box 2305
2715 Edgewood Drive
Post Office Box 2305 (29202)
Columbia, SC 29204
(803) 400-1600 Phone
(803) 400-1200 Fax
Counsel for Appellant

Columbia, South Carolina
Dated: April 13, 2016

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 s 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: Mr. Vito Michael Wicevic
Attorney for SCDHEC
2600 Bull Street
Columbia, South Carolina 29201-1708

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 14, 2016

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SC Court of Appeals

**LAW OFFICE OF JOHNNY E. WATSON
ATTORNEY AND COUNSELOR AT LAW**

2715 Edgewood Avenue
Columbia, South Carolina 29204

Mail Address:
Post Office Box 2305
Columbia, South Carolina 29202
Phone: 803-400-1600
Fax: 803-400-1200

April _____, 2016

Creel Court Reporting Inc.
1230 Richland Street
Columbia, South Carolina 29201-2416

TRANSCRIPT REQUEST LETTER

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SC Court of Appeals

Re: My Client: Robin's Residential Care Facility
1216 Hyatt Avenue (29203)
P. O. Box 3082
Columbia, South Carolina 29230

Case Caption: South Carolina Department of Environmental Control, Respondent v.
Robin's Residential Care Facility; Case #: 14-ALJ-07-0299-CC, Appellate Case #: 2016-000238

Dear Sir or Madam:

I hope this letter finds you in good health and spirits. The purpose of this letter is to request a hearing transcript regarding the above-referenced matter for a hearing held before the Honorable Deborah Brooks Durden on June 1 and June 2, 2015.

I understand that the cost of the transcript is \$1,171.50. Attached is payment for that amount. Please sent me the transcript promptly.

Thank you for your kind consideration in this matter. If you have any questions and/or comments I can always be reached by cell phone at 1-803-467-6212 or at my office.

With kind regards, I am

Very truly yours,

JOHNNY E. WATSON, ATTORNEY AT LAW

By: 

cc: Honorable Jenny Abbott Kitchings, Clerk, S. C. Court of Appeals
Mr. Vito Michael Wicevic, Attorney for SCDHEC
Ms. Lillian Jamison, Robin's Residential Care Facility