

THE STATE OF SOUTH CAROLINA

RECEIVED

In The Court Of Appeals

AUG 23 2016

SC Court of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Gordon G. Cooper, Master-in-Equity

Case No. 2016-001582

The Trustees and Stewards and Members of First African Methodist Episcopal Church
and the Seventh Episcopal District of the African Methodist Episcopal Church and
Reverend Pamela M. Jacobs Appellants

vs.

First African Methodist Church Incorporated and the Board of Directors, Board of
Stewards and Board of Trustees and Members of First African Methodist Church
All Jointly and Severally Respondents.

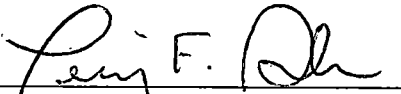
**APPELLANTS' MOTION TO
REQUEST TRANSCRIPT OUT OF TIME**

Pursuant to SCACR Rule 263, the undersigned counsel for the Appellants hereby respectfully requests that this Court grant a four-day extension of time in which to request the transcripts of the May 23-24 trial Court hearing in this matter. Due to the election of a new Bishop for the Seventh Episcopal District of the AME Church at the time of the appeal became due, the undersigned counsel required additional time to consult with the Bishop regarding prosecution of the appeal. Regarding prosecution of the Appeal, transcripts were ordered on August 12, 2016. (see Exhibits A, B & C). Counsel for Appellant has consulted with counsel for Respondent concerning this extension, and has been advised that they have no objection.

[Signature on next page]

Respectfully Submitted,

BOYKIN & DAVIS, L.L.C.

By: 

Charles J. Boykin, Esq.

Kenneth A. Davis, Esq.

Tierney F. Dukes, Esq.

P.O. Box 11844

Columbia, South Carolina 29211

Telephone: (803) 254-0707

Facsimile: (803) 254-5609

Attorneys for Appellants

August 23, 2016
Columbia, South Carolina

EXHIBIT A

BOYKIN & DAVIS, LLC

Attorneys and Counselors at Law

220 STONERIDGE DRIVE, SUITE 100
COLUMBIA, SOUTH CAROLINA 29210
Tierney F. Dukes
tdukes@boykinlawsc.com

TELEPHONE: 803-254-0707
FACSIMILE: 803-254-5609

POST OFFICE BOX 11844
COLUMBIA, SOUTH CAROLINA 29211

August 12, 2016

Ms. Sarah Hollis
Court Reporter
P.O. Box 5666
Spartanburg, SC 29304-5666

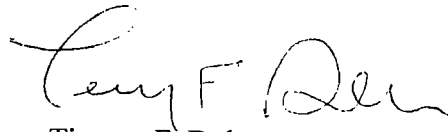
Re: The Trustees and Stewards and Members of First African Methodist Episcopal Church and the Seventh Episcopal District of the African Methodist Episcopal Church and Reverend Pamela M. Jacobs, vs. First African Methodist Church incorporated and the Board of Directors, Board of Stewards and Board of Trustees and Members of First African Methodist Church. All Jointly and Severally
C.A. No.: 2008-CP-42-01022

Dear Ms. Hollis:

This letter is to request an estimate for the hearing transcript regarding the above-referenced matter, regarding a hearing before the Honorable Gordon G. Cooper on May 23 and May 24, 2016.

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

Sincerely,



Tierney F. Dukes

/clm

cc: Gary L. Compton, Esq.
Charles J. Boykin, Esq.
Kenneth A. Davis, Esq.

EXHIBIT B

BOYKIN & DAVIS, LLC

Attorneys and Counselors at Law

220 STONERIDGE DRIVE, SUITE 100
COLUMBIA, SOUTH CAROLINA 29210

Tierney F. Dukes

tdukes@boykinlawsc.com

TELEPHONE: 803-254-0707

FACSIMILE: 803-254-5609

POST OFFICE BOX 11844
COLUMBIA, SOUTH CAROLINA 29211

August 12, 2016

Ms. Dottie Huntsinger
Court Reporter
P.O. Box 5666
Spartanburg, SC 29304-5666

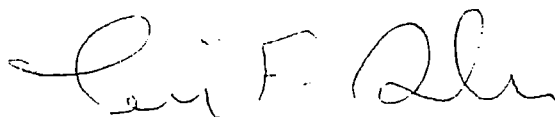
Re: The Trustees and Stewards and Members of First African Methodist Episcopal Church and the Seventh Episcopal District of the African Methodist Episcopal Church and Reverend Pamela M. Jacobs, vs. First African Methodist Church incorporated and the Board of Directors, Board of Stewards and Board of Trustees and Members of First African Methodist Church. All Jointly and Severally
C.A. No.: 2008-CP-42-01022

Dear Ms. Huntsinger:

This letter is to request an estimate for the hearing transcript regarding the above-referenced matter, regarding a hearing before the Honorable Gordon G. Cooper on May 23 and May 24, 2016.

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

Sincerely,



Tierney F. Dukes

/clm

cc: Gary L. Compton, Esq.
Charles J. Boykin, Esq.
Kenneth A. Davis, Esq.

EXHIBIT C

MASTER-IN-EQUITY
SPARTANBURG COUNTY JUDICIAL CENTER
180 MAGNOLIA STREET, ROOM 901 (29306)
POST OFFICE BOX 5666
SPARTANBURG, SOUTH CAROLINA 29304

GORDON G. COOPER
JUDGE

Telephone (864) 596-2501
FAX (864) 596-2078

August 16, 2016

Tierney F. Dukes
BOYKIN & DAVIS, LLC
Post Office Box 11844
Columbia, South Carolina 29211

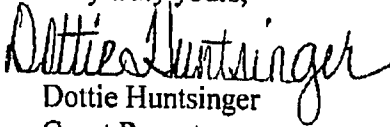
Re: The Trustees and Stewards and Members of First African Methodist Episcopal Church, et al
vs. First African Methodist Church Incorporated, et al

C. A. No.: 2008-CP-42-01022

Dear Ms. Dukes:

I was the Court Reporter for the second day (May 24, 2016) of the trial in the above case. Court Reporters receive \$3.25 per page for transcribing the record. An estimate for transcribing the second day of testimony would be \$625.00.

Very truly yours,


Dottie Huntsinger
Court Reporter

dh

cc: Gary L. Compton, Esq.
Kenneth A. Davis, Esq.
Charles J. Boykin, Esq.

THE STATE OF SOUTH CAROLINA

In The Court Of Appeals

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Gordon G. Cooper, Master-in-Equity

Case No. 2008-CP-42-1022

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The Trustees and Stewards and Members of First African Methodist Episcopal Church
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Stewards and Board of Trustees and Members of First African Methodist Church All
Jointly and Severally Respondents.

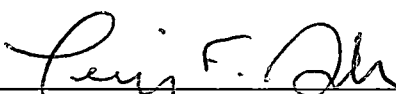
PROOF OF SERVICE

I certify that I have served the **APPELLANTS' MOTION TO REQUEST
TRANSCRIPT OUT OF TIME** in the above-referenced matter on opposing counsel of record,
by mailing a copy of same, postage prepaid and return address clearly indicated, to the following
on this 23rd day of August 2016:

Gary L. Compton, Esq.
296 Daniel Morgan Avenue
Spartanburg, South Carolina 29306

[signature of next page]

BOYKIN & DAVIS, L.L.C.

By: 

Charles J. Boykin

Kenneth A. Davis

Tierney F. Dukes

P.O. Box 11844

Columbia, South Carolina 29211

Telephone: (803) 254-0707

Facsimile: (803) 254-5609

Attorneys for Appellants

BOYKIN & DAVIS, LLC

Attorneys and Counselors at Law

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TELEPHONE: 803-254-0707
FACSIMILE: 803-254-5609

POST OFFICE BOX 11844
COLUMBIA, SOUTH CAROLINA 29211

Tierney F. Dukes
hgerald@boykinlawsc.com

August 23, 2016

RECEIVED

AUG 23 2016

SC Court of Appeals

VIA HAND-DELIVERY

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

Re: The Trustees and Stewards and Members of First African Methodist Episcopal Church and the Seventh Episcopal District of the African Methodist Episcopal Church and Reverend Pamela M. Jacobs, vs. First African Methodist Church incorporated and the Board of Directors, Board of Stewards and Board of Trustees and Members of First African Methodist Church. All Jointly and Severally
Appellate Case No. 2016-001582

Dear Ms. Kitchings:

Enclosed herewith for filing, please find the original and seven (7) copies of Appellants' Motion to Request Transcript Out of Time. Appellants inadvertently failed to notify the court of requesting the transcripts. Please return a file-stamped copy of the pleading to our courier. Also, enclosed please find the \$25.00 motion fee.

By copy of this letter, we are serving a copy on counsel for Respondents. Should you have any questions, please feel free to contact our office.

Sincerely,



Tierney F. Dukes

/hhg
Enclosures

cc: Gary L. Compton, Esq. (w/encl.)
Charles J. Boykin, Esq. (w/o encl.)
Kenneth A. Davis, Esq. (w/o encl.)