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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

Kristi Lea Harrington, Circuit Court Judge

Case No. 2015-CP-10-06615

BOUCHELLE
INCORPORATED,

Appellant

v.

CHARLESTON
WRECKING, INC. and
MICHAEL C. GOLEMIS,

Respondent.

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AUG 24 2017

SC Court of Appeals

**MOTION FOR PERMISSION TO ORDER
TRANSCRIPT OUTSIDE OF FILING DEADLINE**

Bouchelle Incorporated respectfully requests permission to order the transcript outside of the filing deadline to the date of August 23, 2017, see Affidavit of Karen M. DeJong, Esq., attached hereto as Exhibit A and Letter Ordering Transcript attached hereto as Exhibit B.

July 23, 2017

s/ Karen M. DeJong
Karen M. DeJong
DeJong Law Firm, LLC
272 West Coleman Blvd., Ste. 200
Mount Pleasant, South Carolina 29464-5652
(843) 216-6161
Attorney for Appellant

Other Counsel of Record:
Kerry W. Koon
147 Wappoo Centre, Suite 203
Charleston, SC 29412
Attorney for Respondent Charleston Wrecking, Inc.

(843) 795-7000

Michael W. Sautter
Query Sautter Forsythe, LLC
147 Wappoo Creek, Suite 202
Charleston, SC 29412
Attorney for Respondent Michael C. Golemis
(843) 795-9500

EXHIBIT A

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AFFIDAVIT OF KAREN M. DEJONG

THE AFFIANT, after first being duly sworn, deposes and states the following:

1. The lower court's Order was received by my office on or about June 14, 2017.
2. I had invasive surgery on June 6, 2017 and was not able to drive or return to work under doctor's orders until July 20, 2017. Nevertheless, on or about July 11, 2017, I was able to file a Notice of Appeal in this matter.
3. After I returned to work, I filed a Corrected Notice of Appeal that was sent on July 25, 2017. I also began the search for the name and address of the court reporter.

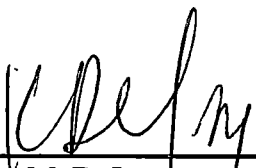
4. There was difficulty in locating the court reporter. On the S.C. Judicial Department's website, Hon. J.C. Nicholson was listed as the Circuit Judge hearing Charleston County Common Pleas motions with a Note that "No C/R Needed" (no court reporter needed) for his hearings.
5. On July 27, 2017, I called the Charleston County Clerk of Court and explained that Hon. Kristi Lea Harrington had been the Judge in the courtroom on that date. The spokesperson suggested that I contact the S.C. Administrator.
6. On July 27, 2017, I called the S.C. Administrator and she was able to tell me that Denise Lauder was the court reporter for the May 17, 2017 hearing.
7. However, I was given the Berkeley County Common Pleas Court's address as the court reporter's address so I contacted the Clerk of Court in Berkeley County to confirm this address for the court reporter.
8. On July 27, 2017, the Berkeley County Clerk confirmed that Denise Lauder was the court reporter for Hon. Kristi Lea Harrington, so I immediately emailed Ms. Lauder.
9. On July 29, 2017, Ms. Lauder confirmed that she was the court reporter for Judge Kristi Lea Harrington but would need to check her records for that specific hearing in Charleston County.
10. On July 31, 2017, Ms. Lauder notified me that it would cost \$88.00 for a copy of the transcript. I immediately sent a check to Ms. Lauder.
11. On August 16, 2017, I followed up with an email to Ms. Lauder re: the status of the delivery date for the transcript.
12. Ms. Lauder responded by email and stated that she had received my check

and that she expected that the transcript will be sent by the end of this week (ending in 8/25/2017).

13. As all communications were by email, a letter formally requesting a copy of the transcript was not also sent.

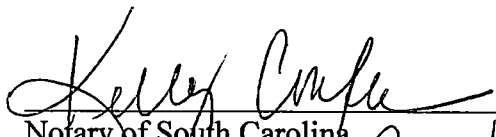
14. In the event that emails between the court reporter and the attorney are not sufficient, a letter formally requesting a copy of the court transcript has been mailed today.

August 23, 2017



Karen M. DeJong
DeJong Law Firm, LLC
272 West Coleman Blvd., Ste. 200
Mount Pleasant, South Carolina 29464-5652
(843) 216-6161
Attorney for Appellant

Sworn to before me this 23rd day
Of August, 2017.



Notary of South Carolina
My Commission Expires: April 19, 2027

EXHIBIT B

DEJONG LAW FIRM, LLC
272 West Coleman Blvd., Ste. 200
Mount Pleasant, SC 29464-5652
Tel. No. 843-216-6161
karen@dejonglawfirm.com

Denise Lauder
Official Court Reporter for
Ninth Judicial Circuit/Berkeley County
300-B California Avenue
Moncks Corner, SC 29461

Re: Bouchelle Incorporated v. Charleston Wrecking, et al.
Case No. 2015-CP-10-6615
Appellate Case No. 2017-001532

Dear Ms. Lauder:

On May 17, 2017, the above case was heard by motion before Hon. Kristi Lea Harrington, Circuit Court Judge, in Charleston County, SC. My investigation reveals that you were the court reporter for this case.

I respectfully request that you provide me with a transcript of the proceedings, including exhibits. Please transcribe the entire record.

I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

August 23, 2017

s/ Karen M. DeJong
Karen M. DeJong
DeJong Law Firm, LLC
272 West Coleman Blvd., Ste. 200
Mount Pleasant, South Carolina 29464-5652
(843) 216-6161
Attorney for Appellant

Other Counsel of Record:
Kerry W. Koon
147 Wappoo Centre, Suite 203
Charleston, SC 29412
Attorney for Respondent Charleston Wrecking, Inc.
(843) 795-7000

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Michael W. Sautter
Query Sautter Forsythe, LLC
147 Wappoo Creek, Suite 202
Charleston, SC 29412
Attorney for Respondent Michael C. Golemis
(843) 795-9500

S.C. Court Administration
1220 Senate Street, Suite 200
Charleston, SC 29201-3739

Clerk, Court of Appeals
1220 Senate Street
Columbia, South Carolina 29201

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PROOF OF SERVICE

I certify that I have served the Motion for Permission to Order Transcript Outside of Filing Deadlines, Affidavit of Karen M. DeJong and Letter to Court Reporter Ordering Transcript, with names, mailing addresses and telephone numbers of all attorneys of record, in compliance with Rule 203, SCACR, on Respondents Charleston Wrecking, Inc. and Michael C. Golemis by depositing a copy of it in the United States Mail, postage prepaid, on August 23, 2017, addressed to their attorneys of record, Kerry W. Koon, 147 Wappoo Centre, Suite 203, Charleston, SC 29412 (for Charleston Wrecking, Inc.) and Michael W. Sautter of Query Sautter Forsythe, LLC, 147 Wappoo Creek, Suite 202, Charleston, SC 29412 (for Michael C. Golemis).

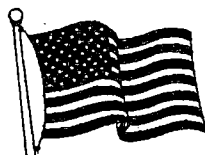
August 23, 2017

s/ Karen M. DeJong
Karen M. DeJong
DeJong Law Firm, LLC
272 West Coleman Blvd., Ste. 200
Mount Pleasant, South Carolina 29464-5652
(843) 216-6161
Attorney for Appellant

Other Counsel of Record:
Kerry W. Koon

147 Wappoo Centre, Suite 203
Charleston, SC 29412
Attorney for Respondent Charleston Wrecking, Inc.
(843) 795-7000

Michael W. Sautter
Query Sautter Forsythe, LLC
147 Wappoo Creek, Suite 202
Charleston, SC 29412
Attorney for Michael C. Golemis



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29201 SC Court of Appeals

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PO ZIP Code	Scheduled Delivery Date (MM/DD/YY)	Postage					
29423	8/24/17	\$ 23.75					
Date Accepted (MM/DD/YY)	Scheduled Delivery Time	Insurance Fee	COD Fee				
8/23/17	<input type="checkbox"/> 10:30 AM <input type="checkbox"/> 3:00 PM <input checked="" type="checkbox"/> 12 NOON	\$	\$				
Time Accepted	10:30 AM Delivery Fee	Return Receipt Fee	Live Animal Transportation Fee				
1835 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	\$	\$	\$				
Special Handling/Fragile	Sunday/Holiday Premium Fee	Total Postage & Fees					
\$	\$	\$ 23.75					
Weight	<input type="checkbox"/> Flat Rate	Acceptance Employee Initials					
lbs. ozs.							

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)	Time	Employee Signature
	<input type="checkbox"/> AM <input type="checkbox"/> PM	
Delivery Attempt (MM/DD/YY)	Time	Employee Signature
	<input type="checkbox"/> AM <input type="checkbox"/> PM	

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