

**THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS**

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APPEAL FROM Horry COUNTY  
COURT OF COMMON PLEAS  
THE HONORABLE BENJAMIN H. CULBERTSON  
CIRCUIT COURT JUDGE

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APPELLATE CASE NO. 2017-001949  
CIVIL ACTION NO. 2016-CP-26-7405

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**RECEIVED**  
NOV 22 2017  
SC Court of Appeals

Ronald L. Legg,

**APPELLANT,**

versus

Lisa H. Bourcier, Director-Supervising  
Authority, and Horry County Public Information  
Office,

**RESPONDENTS.**

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**RESPONDENTS' MOTION TO STAY DEADLINE TO FILE THE INITIAL  
RESPONDENTS' BRIEF AND DESIGNATION OF MATTER TO BE INCLUDED  
IN THE RECORD ON APPEAL**

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Appellant Ronald L. Legg filed and served his Initial Appellant's Brief on November 5, 2017 in the above-captioned case. Based on this service date, the Initial Brief of Respondents and Designation of Matter to be Included in the Record on Appeal are due on Tuesday, December 5, 2017.

However, Appellant ordered the hearing transcripts on October 29, 2017 (See attached Exhibit "A"). Respondents have ordered a copy of these hearing transcripts on

November 21, 2017. (See attached Exhibit "B"). To the Respondents' knowledge, the transcripts have not yet been received by Appellant.

Under the South Carolina Appellate Court Rules, the Initial Appellant's Brief is due thirty (30) days after Appellant's receipt of the transcript. See Rule 208(a)(1), SCACR. While Appellant has filed his brief before the receipt of the hearing transcripts, Respondents desire to review the hearing transcripts before filing their Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal.

Accordingly, Respondents respectfully request this Court for an order staying the deadline to file the Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal until thirty (30) days after Respondents receive the hearing transcripts. Respondents will notify this Court of their receipt of the hearing transcripts.

Respectfully submitted,



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Douglas C. Baxter  
RICHARDSON, PLOWDEN & ROBINSON, PA  
Post Office Drawer 3646  
Myrtle Beach, South Carolina 29578  
(843) 448-1008

Carmen V. Ganjehsani  
RICHARDSON, PLOWDEN & ROBINSON, PA  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
**ATTORNEYS FOR RESPONDENTS**

November 21, 2017.

# **EXHIBIT “A”**

q.b

Court Reporter  
Grace L. Hunley  
P.O. Box 30878  
Myrtle Bch., S.C. 295

RECEIVED

OCT 31 2017  
SC Court of Appeals

Re: Ronald L. Legg v. Lisa Bourcier  
Appellate Case No. 2017-001949

Dear Grace L. Hunley,

The above case was heard before Honorable Judge Culbertson on two separate dates, on 4/12/2017, and on 5/17/2017, Case 2016-CO-26-7405.

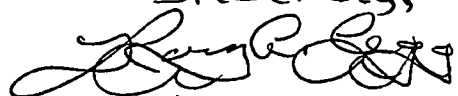
I request that you provide me with a transcript of both proceedings. Please transcribe the entire records.

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

Thank You

Oct. 29, 2017

cc Court of Appeals  
Douglas Charles Baxter, Esquire

Sincerely,  
  
Ronald L. Legg #359236  
ECI FS-121  
610 Hwy. 9, West  
Bennettsville, S.C. 29512

# **EXHIBIT “B”**

**Reply to: Carmen V. Ganjehsani**  
Direct Dial: 803-253-8692  
cganjehsani@richardsonplowden.com

November 21, 2017

Grace L. Hurley  
P.O. Box 30878  
Myrtle Beach, SC 29588

**Re: Ronald L. Legg v. Lisa Bourcier**  
**Appellate Case No. 2017-001949**  
**Case No.: 2016-CP-26-7405**  
**RPR File No.: 8401-21**

Dear Ms. Hurley:

I am writing to request a copy of the transcript for the hearing held on April 12, 2017 before the Honorable Benjamin H. Culbertson and a copy of the transcript for the hearing held on May 17, 2017 before the Honorable Benjamin H. Culbertson in the above-referenced case. Mr. Legg previously ordered the original transcripts from you by letter dated October 29, 2017, a copy of which is enclosed.

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Please forward your bill along with our copies of the transcripts, and we will see that it is promptly paid.

If you need any further information or assistance, please do not hesitate to contact my office.

Sincerely,



Carmen V. Ganjehsani

CVG

Enc. (Transcript Order by Mr. Legg)

cc: The Honorable Jenny Abbott Kitchings (w/o enc.)  
Tonnya K. Kohn, Interim Director, S.C. Court Administration (w/o enc.)  
Ronald L. Legg (w/o enc.)  
Douglas C. Baxter (FYI)

**CERTIFICATE OF SERVICE**

I, the undersigned, attorney for Respondents, do hereby certify that I have this date served the foregoing Motion to Stay Deadline to File the Initial Respondents' Brief and Designation of Matter to be Included in the Record on Appeal dated November 21, 2017, by causing the same to be deposited in a United States Postal Service mailbox, postage prepaid, addressed to counsel of record as indicated below:

Ronald L. Legg #359236  
Evans Correctional Institute  
610 Highway 9 West  
Bennettsville, SC 29512  
**Appellant *Pro Se***



Carmen V. Ganjehsani  
RICHARDSON, PLOWDEN & ROBINSON, PA  
1900 Barnwell Street (29201)  
Post Office Drawer 7788  
Columbia, South Carolina 29202  
(803) 771-4400  
**ATTORNEYS FOR RESPONDENTS**

Dated: November 21, 2017.

**RECEIVED**

NOV 22 2017

SC Court of Appeals

Reply to: **Carmen V. Ganjehsani**  
Direct Dial: 803-253-8692  
cganjehsani@richardsonplowden.com

November 21, 2017

The Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

NOV 22 2017

SC Court of Appeals

**Re: Ronald L. Legg v. Lisa Bourcier**  
**Appellate Case No. 2017-001949**  
**RPR File No.: 8401-21**

Dear Ms. Kitchings:

I am writing to advise the Court that the undersigned, Carmen V. Ganjehsani, is appearing as additional counsel of record for the Respondents Lisa H. Bourcier, Director – Supervising Authority, and Horry County Public Information Office. I would request that my name be added along with Douglas C. Baxter’s as counsel for the Respondents, and that I be copied on future documents and correspondence regarding this appeal. I would further request that Appellant also copy me on future documents and correspondence.

I am also enclosing for filing the original and six copies of the Respondents’ Motion to Stay the Deadline to File the Initial Respondents’ Brief and Designation of Matter to be Included in the Record on Appeal in the above referenced matter, along with our Certificate of Service. Also enclosed is our firm’s check in the amount of \$25.00 to cover the filing fee for this Motion

If the Court requires anything further or you have any questions, please do not hesitate to contact me.

Sincerely,



Carmen V. Ganjehsani

CVG

Encs.

cc: Ronald L. Legg (w/enc.)  
Douglas C. Baxter (FYI)

11/21/2017  
US POSTAGE \$002.87<sup>0</sup>



ZIP 29201  
011F11670150



8401-021

RICHARDSON  
RICHARDSON PLOWDEN ROBINSON, P.A.  
PLOWDEN  
ATTORNEYS AT LAW

COLUMBIA P.O. Drawer 7788 • Columbia, SC 29202

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NOV 22 2017  
SC Court of Appeals

The Honorable Jenny Abbott Kitchings  
Clerk of Court, S.C. Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211