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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKER'S COMPENSATION COMMISSION
W.C.C. File No. 1512151

Appellate Case No. 2018-000216

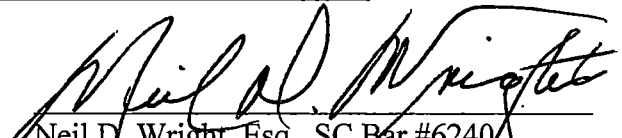
Donna Dozier, Claimant, Appellant

v.

Georgetown County School District, Employer, and
SC School Boards Insurance Trust, Carrier, Respondents

**NOTICE OF MOTION AND MOTION REQUESTING PERMISSION TO ORDER
TRANSCRIPT OUTSIDE OF THE FILING DEADLINE SET BY RULE 207 OF THE
SOUTH CAROLINA APPELLATE COURT RULES**

March 7, 2018


Neil D. Wright, Esq., SC Bar #6240
BARNETT & WRIGHT, P.A.
1304 Azalea Court, Suite B
Myrtle Beach, SC 29577-5723
Office: (843) 449-0781 Ext. #3
Fax: (843) 449-1583
nwright@barnettandwright.com
Attorney for Appellant

Other Counsel of Record:
Timothy B. Killen, Esq.
Holder Padgett Littlejohn + Prickett, LLC
210 Wingo Way, Suite 201
Mount Pleasant, SC 29464
Office: (843) 277-0826
Fax: (843) 589-9000
tkillen@hplplaw.com
Attorney for Respondents

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MAR 09 2018

SC Court of Appeals

NOTICE OF MOTION AND MOTION REQUESTING PERMISSION TO ORDER TRANSCRIPT OUTSIDE OF THE FILING DEADLINE SET BY RULE 207 OF THE SOUTH CAROLINA APPELLATE COURT RULES.

Now comes the Appellant who moves this Honorable Court for an Order that permits the Appellant to order a transcript of the Appellate Panel Hearing of the South Carolina Workers Compensation Commission outside of the filing deadline set by Rule 207 of the South Carolina Appellate Court Rules. This motion is made pursuant to Rule 240 SCACR and is supported by the attached Affidavit and Exhibits "A" and "B".

1. The Appellant Donna Dozier has appealed the Appellate Panel Decision and Order of the South Carolina Workers Compensation Commission dated January 12, 2018. The Appellant received a copy of the Commission's Appellate Panel Decision and Order by an e-mail transmission from the Commission on January 12, 2018. The Appellant filed her Notice of Appeal on February 9, 2018.

2. That Rule 207(b) SCACR provides that in an appeal from an Administrative Tribunal the appellant shall make satisfactory arrangements with the administrative agency to obtain a transcript of the proceeding before that body.

3. That counsel for the Appellant contacted the Judicial Department of the South Carolina Workers Compensation Commission by telephone on three occasions to inquire about the procedure for obtaining a transcript of the hearing before the Commission's Appellate Panel. On February 28, 2018, the date of the third attempt of Appellant's counsel to contact the Commission to inquire about the procedure for obtaining a transcript of hearing, Appellant's counsel spoke with Ms. Tracy Riddle of the South Carolina Workers Compensation Commission who advised counsel to directly contact Mr. Travis McLeod, who was the court reporter for the hearing before the

Appellate Panel. Ms. Tracy Riddle further provided Appellant's counsel a telephone number for reporter Travis McLeod, which was the telephone number of Creel Court Reporting.

4. On February 28, 2018, counsel for the Appellant spoke with Ms. Coral Strickland of Creel Court Reporting who advised counsel of the estimated cost of the requested transcript.

5. Attached hereto and designated as Exhibit "A" is email correspondence dated February 28, 2018 from Appellant's counsel to Ms. Coral Strickland of Creel Court Reporting confirming counsel's attempt to reach Court Reporter Travis McLeod.

6. Attached hereto and designated as Exhibit "B" is the letter of Appellant's counsel to Court Reporter Travis McLeod, in care of Creel Court Reporting, dated March 2, 2018, which requests a transcript of the Appellate Review Hearing on November 14, 2017 and references the estimated cost of the transcript.

7. Counsel for the Appellant made a good faith effort to comply with Rule 207(b) SCACR by attempting to make satisfactory arrangements with the South Carolina Workers Compensation Commission to obtain a transcript of the proceeding before that body.

8. Upon being informed that the transcript of the proceedings must be obtained directly from the court reporter, counsel for the Appellant has acted diligently to order the required transcript.

9. That granting the Appellant's request for an Order that permits the Appellant to order a transcript of the Appellate Panel Hearing of the South Carolina Workers Compensation Commission outside of the filing deadline set by Rule 207 of the

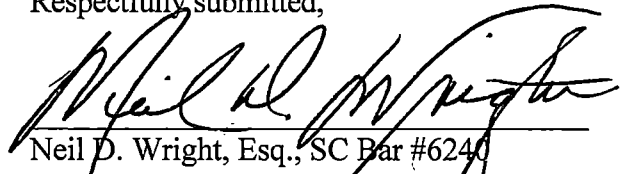
South Carolina Appellate Court Rules will not materially delay the proceedings in this Honorable Court.

10. That granting the Appellant's request for an Order that permits the Appellant to order a transcript of the Appellate Panel Hearing of the South Carolina Workers Compensation Commission outside of the filing deadline set by Rule 207 of the South Carolina Appellate Court Rules will not prejudice the Respondents.

materially delay the proceedings in this Honorable Court.

WHEREFORE, the Appellant respectfully requests that this Honorable Court grant the Appellant's request for an Order that permits the Appellant to order a transcript of the Appellate Panel Hearing of the South Carolina Workers Compensation Commission outside of the filing deadline set by Rule 207 of the South Carolina Appellate Court Rules.

Respectfully submitted,



Neil D. Wright, Esq., SC Bar #6240
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Office: (843) 449-0781 Ext. #3
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nwright@barnettandwright.com
Attorney for Appellant

March 7, 2018

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKER'S COMPENSATION COMMISSION
W.C.C. File No. 1512151

Appellate Case No. 2018-000216

Donna Dozier, Claimant, Appellant

v.

Georgetown County School District, Employer, and
SC School Boards Insurance Trust, Carrier, Respondents

**AFFIDAVIT IN SUPPORT OF MOTION REQUESTING PERMISSION TO ORDER
TRANSCRIPT OUTSIDE OF THE FILING DEADLINE SET BY RULE 207 OF THE
SOUTH CAROLINA APPELLATE COURT RULES**

BEFORE ME, the undersigned authority, a Notary Public in and for the State of South Carolina, personally appeared Neil D Wright, who, being first duly sworn upon oath, did depose and say as follows

1. I am legal counsel for the Appellant Donna Dozier in the above matter. I filed the Notice of Appeal on behalf of the Appellant in the above matter on February 9, 2018.

2. That Rule 207(b) SCACR provides that in an appeal from an Administrative Tribunal the appellant shall make satisfactory arrangements with the administrative agency to obtain a transcript of the proceeding before that body.

3. That I contacted the Judicial Department of the South Carolina Workers Compensation Commission by telephone on three occasions to inquire about the procedure for obtaining a transcript of the hearing before the Commission's Appellate Panel. On February 28, 2018, the date of my third attempt to contact the Commission to inquire about the procedure for

obtaining a transcript of hearing, I spoke with Ms. Tracy Riddle of the South Carolina Workers Compensation Commission who advised me to directly contact Mr. Travis McLeod, who was the court reporter for the hearing before the Appellate Panel. Ms. Tracy Riddle further provided me a telephone number for reporter Travis McLeod, which was the telephone number of Creel Court Reporting.

4. On February 28, 2018, I spoke with Ms. Coral Strickland of Creel Court Reporting who advised me of the estimated cost of the requested transcript.

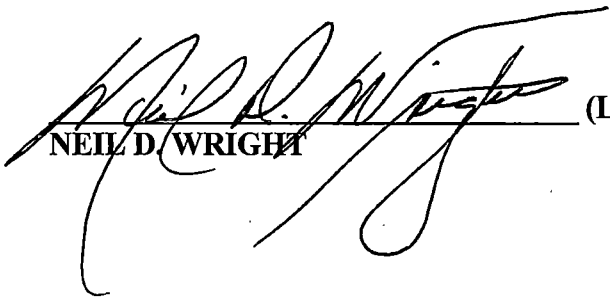
5. Attached hereto and designated as Exhibit "A" is my email correspondence dated February 28, 2018 to Ms. Coral Strickland of Creel Court Reporting confirming my attempt to reach Court Reporter Travis McLeod.

6. Attached hereto and designated as Exhibit "B" is my letter to Court Reporter Travis McLeod, in care of Creel Court Reporting, dated March 2, 2018, which requests a transcript of the Appellate Review Hearing on November 14, 2017 and references the estimated cost of the transcript.

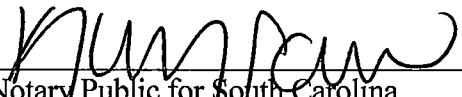
7. I am informed and I believe that I have made a good faith effort to comply with Rule 207(b) SCACR by attempting to make satisfactory arrangements with the South Carolina Workers Compensation Commission to obtain a transcript of the proceeding before that body.

8. Upon being informed that the transcript of the proceedings must be obtained directly from the court reporter, I believe that I have acted diligently to order the required transcript from Court Reporter Travis McLeod.

FURTHER, THE AFFIANT SAYETH NOT.


NEIL D. WRIGHT (L.S.)

SWORN TO and subscribed before
me this 7 day of March, 2018.


Notary Public for South Carolina (L.S.)

K. Meagan Cowles
Print Name of Notary Public

My Commission Expires: 09/21/27

(NOTARY SEAL)

K. MEAGAN COWLES
Notary Public, State of South Carolina
My Commission Expires Sep. 21, 2027

Neil Wright

From: Neil Wright
Sent: Wednesday, February 28, 2018 3:39 PM
To: 'contact@creelreporting.com'
Subject: Donna Dozier v. Georgetown County School District SCWCC 1512151

This e-mail is a follow up to my telephone conference with Coral Strickland of Creel Reporting. I am attempting to reach Court Reporter Travis McLeod. I understand that Mr. McLeod was the court reporter for the hearing before the SCWCC appellate panel in the above matter on November 14, 2017. I have appealed the decision of the Appellate Panel to the South Carolina Court of Appeals and I wish to order a transcript of the hearing before the appellate panel. Please have Mr. McLeod contact me. If he is not able to reach me at the office number listed herein, he may reach me on my cell phone at (843) 455-1145.

Neil D. Wright, Esq.
BARNETT & WRIGHT, P.A.
1304 Azalea Court, Suite B
Myrtle Beach, SC 29577-5723
(843) 449-0781-Telephone
(843) 449-1583-Facsimile
(843) 353-6243-Direct Dial

Exhibit "A"

BARNETT & WRIGHT, P.A.
ATTORNEYS AT LAW
1304 AZALEA COURT, SUITE B
MYRTLE BEACH, SOUTH CAROLINA 29577

ROBERT L. BARNETT
NEIL D. WRIGHT
MATTHEW N. WRIGHT

Telephone: (843)449-0781-Ex#3
Telecopier: (843)449-1583
E-mail: nwright@barnettandwright.com
(Not for Confidential Communication)

March 2, 2018

VIA E-MAIL and U.S. MAIL

Mr. Travis McLeod
C/O Creel Court Reporting
1230 Richland Street
Columbia, SC 29201

RE: Donna Dozier v. Georgetown County School District
SCWCC Case No. 1512151
SC Appellate Case No. 2018-000216

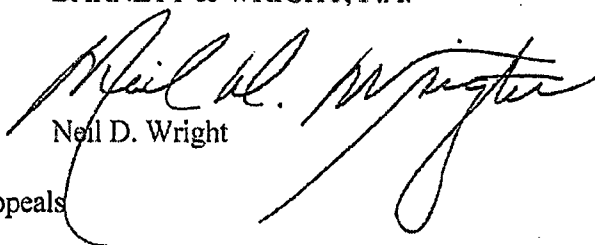
Dear Mr. McLeod:

I am counsel for Donna Dozier, the claimant in the above matter. Ms. Tracy Riddle of the South Carolina Workers Compensation Commission recently informed me that you were the court reporter for the Appellate Review Hearing in the above matter on November 14, 2017. I have filed an appeal of the Appellate Panel's decision in the South Carolina Court of Appeals and I require a transcript of the Appellate Review Hearing on November 14, 2017. I am therefore requesting that you prepare a transcript of the Appellate Review Hearing on November 14, 2017.

I contacted Coral Strickland of Creel Court Reporting in an effort to obtain your address to contact you directly to request the hearing transcript. Coral Strickland advised me to send my transcript request to you in care of Creel Court Reporting. Ms. Strickland advised me that the estimated cost of the transcript is \$157.50 and the actual cost of the transcript will be determined and billed to me upon completion. Thank you for your prompt attention to this matter.

Very truly yours,

BARNETT & WRIGHT, P.A.


Neil D. Wright

NDW/kmc

cc: Clerk, South Carolina Court of Appeals
Timothy B. Killen, Esq.

Exhibit "B"

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM THE SOUTH CAROLINA WORKER'S COMPENSATION COMMISSION
W.C.C. File No. 1512151

Appellate Case No. 2018-000216

Donna Dozier, Claimant, Appellant

v.

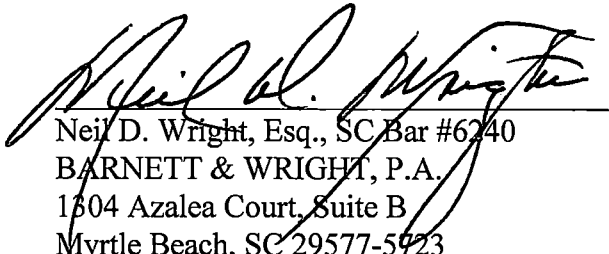
Georgetown County School District, Employer, and
SC School Boards Insurance Trust, Carrier, Respondents

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SC Court of Appeals

PROOF OF SERVICE

I certify that I have served the Appellant's Notice of Motion and Motion Requesting Permission to Order Transcript Outside of the Filing Deadline Set by Rule 207 of the South Carolina Appellate Court Rules upon the Respondents Georgetown County School District and SC School Boards Insurance Trust by depositing a copy of the Appellant's Notice of Motion and Motion in the United States Mail, postage prepaid, on March 7, 2018, addressed to the Respondents' counsel of record, Timothy B. Killen, Esq., at Holder Padgett Littlejohn + Prickett, LLC, 210 Wingo Way, Suite 201, Mount Pleasant, SC 29464

March 7, 2018


Neil D. Wright, Esq., SC Bar #6240
BARNETT & WRIGHT, P.A.
1304 Azalea Court, Suite B
Myrtle Beach, SC 29577-5923
Office: (843) 449-0781 Ext. #3
Fax: (843) 449-1583
nwright@barnettandwright.com
Attorney for Appellant

cc: Hon. Jenny Abbott Kitchings
Timothy B. Killen, Esq.

BARNETT & WRIGHT, P.A.
ATTORNEYS AT LAW
1304 AZALEA COURT, SUITE B
MYRTLE BEACH, SOUTH CAROLINA 29577

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SC Court of Appeals

ROBERT L. BARNETT
NEIL D. WRIGHT
MATTHEW N. WRIGHT

Telephone: (843)449-0781-Ext#3
Telecopier: (843)449-1583
E-mail: nwright@barnettandwright.com
(Not for Confidential Communication)

March 7, 2018

The Honorable Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
Post Office Box 11629
Columbia, South Carolina 29211

RE: Donna Dozier, Claimant, Appellant, v. Georgetown County School District, Employer, and
SC School Boards Insurance Trust, Carrier, Respondents
Appellate Case No. 2018-000216

Dear Ms. Kitchings:

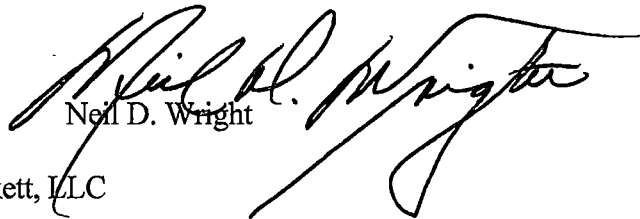
I am enclosing herewith for filing the following documents in the above case:

- (1) Original and six (6) copies of Appellant's Notice of Motion and Motion Requesting Permission to Order Transcript Outside of the Filing Deadline Set by Rule 207 of the South Carolina Appellate Court Rules;
- (2) Original and six (6) copies of Affidavit and Exhibits "A" and "B" in Support of Motion; and,
- (3) Original and six (6) copies of Proof of Service of Appellant's Motion upon the Respondents.

I am also enclosing herewith my firm check in payment of the motion filing fee of \$25.00.

Very truly yours,

BARNETT & WRIGHT, P.A.


Neil D. Wright

cc: Timothy B. Killen, Esq.
Holder Padgett Littlejohn + Prickett, LLC
210 Wingo Way, Suite 201
Mount Pleasant, SC 29464
Attorney for Respondents

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BARNETT & WRIGHT, P.A.
1304 AZALEA CT STE B
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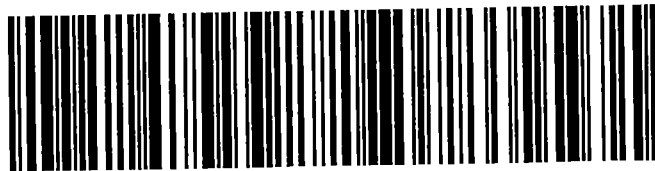
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SHIP TO: Hon. Jenny Abbott Kitchings
Clerk, South Carolina Court of Appeals
PO Box 11629
Columbia SC 29211-1629



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SC Court of Appeals