

SAVAGE LAW PLLC
Counselors at Law

June 13, 2018

Respond to: dsavage@savagelitigation.com
South Carolina Office

VIA FACSIMILE TRANSMISSION (803.734.1800)(803.734.1839)
AND REGULAR, FIRST CLASS MAIL

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

RECEIVED

JUN 13 2018

SC Court of Appeals

Rosalyn W. Frierson
Director
South Carolina Office of Court Administration
Calhoun Building
1220 Senate Street, Suite 200
Columbia, SC 29201-3739

Re: Haas, et al. v. TI Oldfield Operations LLC, et al.
Court of Appeals Case No. 2018-000-707 (the "Appeal")
Notification of Receipt of Transcript

Dear Sir/Madam:

Pursuant to South Carolina Court of Appeals Rule 207, this letter and enclosures serve as notice that: (i) by letter dated April 16, 2018, the Plaintiffs-Appellants in the above referenced Appeal contacted the Court Reporter in the lower court action to order the lower court hearing transcript; (ii) that on April 18, 2018, the Court Reporter (Ms. Elizabeth Harris) emailed Plaintiffs-Appellants' counsel notifying Plaintiffs' counsel of the cost of the transcript; (iii) that on April 26, 2018, Ms. Harris notified Plaintiffs-Appellants' counsel that she had received counsel's check in payment of the transcript; and (iv) on May 2, 2018 Ms. Harris emailed the Plaintiffs-Appellants' counsel a .pdf copy of the transcript, which Plaintiffs' counsel e-filed in the lower court action (Case No. 2016CP0700602)

Enclosed herewith is a copy of all of the above-reference correspondence.

Based upon a Court of Appeals order entered in the Appeal (wherein the Court extended Plaintiffs-Appellants' time to file their initial brief by thirty (30) days), and, thus, counting sixty (60) days from the receipt of the transcript on May 2, 2018, it is Plaintiffs-Appellants' understanding that they must file their *initial brief* (under Court Rule 208), along with a *Designation of Matter to be Included in the Record on Appeal*, on or before **July 1, 2018**.



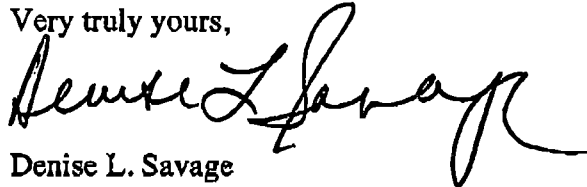
South Carolina Court of Appeals
South Carolina Office of Court Administration
June 13, 2018
Page 2 of 2

SAVAGE LAW PLLC
Counselors at Law

If we are mistaken as to the above deadline, please advise as soon as practicable.

Thank you for your kind attention to and consideration of the foregoing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Denise L. Savage". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Denise L. Savage

Encl.
DLS/cag

Cc: Via Email Transmission Only
Ian Ford, Esq.
Merritt Abney, Esq.
Chris Ogiba, Esq.
Suzanne Deters, Esq.

SAVAGE LAW PLLC
Counselors at Law

April 16, 2018

VIA PRIORITY MAIL EXPRESS – USPS

Elizabeth B. Harris
414 Autumn Circle
Columbia, SC 29206

Re: **Haas v. TI Oldfield Operations LLC**
Case No. 2016CP0700602 (the "Action")

Dear Ms. Harris:

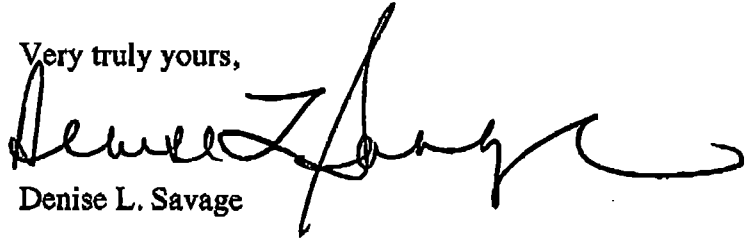
I understand that you were the court reporter for a hearing in the above-referenced case which took place before the Honorable Edgar W. Dickson on September 19, 2017 (the "Hearing"). Today, Plaintiff in this Action has filed a notice of appeal (the "Appeal") to the Court of Appeals of a decision entered by Judge Dickson and related to the Hearing. Thus, Plaintiff requires a copy of the transcript of the Hearing to file in the Appeal.

To this end, we are writing to request a copy of the transcript from the Hearing as soon as convenient for you. Once a copy of the Transcript is available, please forward me a copy of the transcript from that Hearing to our South Carolina Office:

Denise L. Savage, Esq.
Savage Law PLLC
500 Carteret Street
Beaufort, SC 29902

Please let me know the cost and how you prefer payment to be made (i.e. by either check or credit card). Thank you in advance for your kind assistance in this matter.

Very truly yours,



Denise L. Savage

DLS/cag



From: Harris, Elizabeth B. EHarris@sccourts.org
Subject: Transcript Request: Haas v. Oldfield Operations
Date: April 18, 2018 at 12:34 AM
To: dsavage@savagelitigation.com

In Re: Haas v. TI Oldfield Operations, LLC
September 19, 2017


Dear Ms. Savage,

Thank you for your request in the above-referenced case. I have reviewed my records and estimate your transcript will be 60 pages. Based on the current rate of \$3.25 per page, the cost will be \$195.00. If you need this on an expedited basis (a 7-day turnaround), the cost will be \$4.25 per page for a total of \$255.00.

Under our rules, I have 60 days in which to complete the work (unless, of course, the work is expedited). Upon receipt of a check made out to me from your office to my address below, the 60 days begin. If I have underestimated the number of pages, I will include a bill with your transcript. If I have over estimated the number of pages, you will be refunded the overpayment.

Cordially,
Elizabeth B. Harris, CVR-M-CM
Court Reporter to the Honorable L. Casey Manning
414 Autumn Circle
Columbia, SC 29206

--- CONFIDENTIALITY NOTICE --- This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

From: Harris, Elizabeth B. EHarris@sccourts.org 
Subject: Check Received
Date: April 26, 2018 at 3:37 PM
To: dsavage@savagelitigation.com

Good afternoon. Your check arrived today, so I will have it for you within 7 days.

Thanks!

Elizabeth Harris

~~~~ CONFIDENTIALITY NOTICE ~~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

From: Harris, Elizabeth B. EHarris@eccourts.org  
Subject: Transcript: Haas v. Oldfield  
Date: May 2, 2018 at 3:35 PM  
To: dsavage@savagelitigation.com

Good afternoon. Please find attached your expedited transcript of the September 19, 2017, hearing before Judge Dickson. I underestimated by 12 pages, so I will send an invoice in a few minutes.

Cordially,

Elizabeth B. Harris, CVR-M-CM

Official Court Reporter

to the Hon. L. Casey Manning

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PDF



HAAS vs
OLDFIE...18.pdf

From: **denise l savage** dsavage@savagelitigation.com
 Subject: Fwd: Transcript: Haas v. Oldfield- COA Case No. 2018-000-707
 Date: June 13, 2018 at 2:38 PM
 To: Ian Ford ian.ford@fordwallace.com, Merritt Abney merritt.abney@nelsonmullins.com, Chris Oglba chrisogiba@mvalaw.com, Suzanne Deters sdeters@ethridgelawgroup.com

Please be advised that the Transcript in the above referenced action was received by Plaintiffs' counsel on May 2, 2018.

Pursuant to SC Court of Appeals Rule 207, notification of receipt of the transcript has been faxed to the Court of Appeals Clerk's Office and the South Carolina Office of Court Administration (copy of such notification to follow).

With respect to the timing of Appellants' Initial Brief to be filed in the Appeal, SC Court of Appeals Rule 208 provides that "[w]ithin thirty (30) days after receiving the transcript, ...appellant shall serve one copy of his brief..."

In addition, as you know, the Court of Appeals entered an order in this appeal extending Plaintiffs' time to file their brief for an additional 30 days.

Thus, Plaintiffs' initial brief must be filed and served on or before July 1, 2018.

Best,

Denise Savage

Begin forwarded message:

From: "Harris, Elizabeth B." <EHarris@sccourts.org>
 Subject: Transcript: Haas v. Oldfield
 Date: May 2, 2018 at 3:35:04 PM EDT
 To: "dsavage@savagelitigation.com" <dsavage@savagelitigation.com>

Good afternoon. Please find attached your expedited transcript of the September 19, 2017, hearing before Judge Dickson. I underestimated by 12 pages, so I will send an invoice in a few minutes.

Cordially,

Elizabeth B. Harris, CVR-M-CM

Official Court Reporter

to the Hon. L. Casey Manning

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PDF



HAAS vs
 OLDFIE...18.pdf

Denise L. Savage, Esq.

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Counselors at Law

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Bronx, New York 10451
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(F) 914.271.5255

[USE THE BELOW ADDRESS FOR MAILING]

South Carolina Office:

500 Carteret Street
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(F) 843.522.2152
dsavage@savagelitigation.com
www.savagelitigation.com

Admitted to the bars of: New York, New Jersey, South Carolina, Georgia, North Carolina, US Supreme Court, Second Circuit Court of Appeals, Northern and Southern Districts of New York, District of South Carolina



Dedicated. Trusted. Advocates.

NOTICE:

Please Note: Our firm name and email address have changed. We will continue to receive emails via the former address.

Confidentiality Notice: This e-mail is sent by a law firm and may contain information that is privileged or confidential. If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately.

IRS Circular 230 Disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that, unless explicitly provided otherwise, any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.