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

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

THE HONORABLE MICHAEL G. NETTLES, CIRCUIT COURT JUDGE

APPELLATE CASE NO.: 2018-001675

Allstate Property and Casualty
Insurance Company,

Respondent,

RECEIVED

OCT 12 2018

SC Court of Appeals

v.

Natoshia Hamilton,

Appellant.

MOTION FOR EXTENSION OF TIME TO ORDER TRANSCRIPT

Pursuant to Rule 240, SCACR, Appellant Natoshia Hamilton respectfully moves this Court for an Extension of Time to Order Transcript.

Appellant contends that the good cause to grant this Motion exists for the following reasons:

1. On September 12, 2018, Counsel for Appellant wrote to Krystal J. Smith, who was the Court Reporter for the hearing in the underlying matter titled Allstate Property and Casualty Insurance Company v. Natoshia Hamilton and Kenneth Coogler, 2017-CP-21-0341. (Exhibit 1). Said request was made via USPS and email. A copy of that letter is also

✓

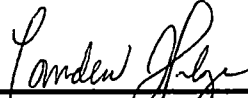
being filed with the Court of Appeals.

2. Counsel for Respondent, Court Administration, and the Clerk of Court for the South Carolina Court of Appeals were provided with copies of the same (See Exhibit 1).
3. On September 12, 2018, Krystal J. Smith emailed counsel for the Appellant and stated that she received the request for transcript and added it to her list. (Exhibit 2).
4. Counsel for Appellant certifies the above is true as evidenced by the attached affidavit. (Exhibit 3).
5. On October 3, 2018, counsel for Appellant received a letter from the South Carolina Court of Appeals stating that its records reflect that the time for ordering the transcript has expired. (Exhibit 4). Said letter asked Appellant to file a copy of the letter showing that the transcript had been ordered directly from the Court Reporter, along with a motion requesting permission to order the transcript outside of the filing deadlines set by Rule 207, SCACR.

Accordingly, Appellant respectfully avers that she has complied with the strictures of Rule 207, SCACR. This Motion is filed out of an abundance of counsel and in accordance with this Court's October 3, 2018 letter.

Appellant therefore asks that this Court GRANT her Motion for the reasons set forth herein.

[Signature Block on Following Page]



Roy T. Willey, IV
S.C. Bar No.: 101010
Eric M. Poulin
S.C. Bar No.: 100209
J. Camden Hodge
S.C. Bar No.: 100638
32 Ann Street
Charleston, South Carolina 29403
(843) 614-8888
Fax: (843) 494-5536
camden@akimlawfirm.com
eric@akimlawfirm.com
roy@akimlawfirm.com

**ATTORNEYS FOR
THE APPELLANT**

Dated at Charleston, SC
October 12, 2018

Exhibit 1

TOLL FREE: 1 (800) 313-2546
FACSIMILE: (843) 494-5536

REPLY TO ANN STREET OFFICE
CAMDEN@AKIMLAWFIRM.COM

ANASTOPOULO LAW FIRM

AKIMA ANASTOPOULO (SC)

JONATHAN N. ALKIS (SC)
CONSTANCE ANASTOPOULO (SC)*
GARRETT L. BROWN (SC)
KENNETH T. DAVID (SC)
STEFAN B. FEIDLER (SC)(GA)
HERB F. GLASS (SC)
MARLEY N. GRIM (SC)
J. CAMDEN HODGE (SC)
LANE D. JEFFERIES (SC)
THOMAS D. KANDLER, II (NC)
BYRON V. LEARY, II (SC)
BENJAMIN W. LEE (SC)
MATTHEW L. NALL (SC)
ERIC M. POULIN (SC)(NC)(GA)(CA)
SAMANTHA SUTTON (SC)(NC)
CASEY VAN VALKENBURGH (SC)(IL)
P. HEATH WARD (SC)
DANNY LEE WILLARD, JR. (SC)
ROY T. WILLEY, IV (SC)
L. CRAYTON WILLIAMS (SC)

*OF COUNSEL

September 12, 2018

Krystal J. Smith
krsmith@sccourts.org
PO Box 13563
Florence, SC 29504

Re: *Allstate v. Natoshia Hamilton and Kenneth Coogler*
C/A No: 2017-CP-21-0341

Dear Ms. Smith:

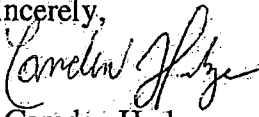
I hope this finds you well. A hearing in the above-referenced matter was conducted before the Honorable Michael G. Nettles on June 1, 2018 at 2:00 PM at the Florence County Courthouse. It is my understanding that you served as the court reporter for that proceeding.

As counsel for the Appellant Natoshia Hamilton, I respectfully request that you furnish me with a copy of the transcript from that proceeding. Please furnish the transcript within sixty (60) days of this request. We agree to pay the per page charge for the transcript.

By copy of this letter, I am advising opposing counsel, Court Administration, and the Court of Appeals of this request.

If you have any questions or concerns please do not hesitate to contact me directly. Thank you for your assistance in this matter.

Sincerely,



J. Camden Hodge

cc: Johnston Cox
1201 Main Street
Suite 1200
Columbia, SC 29201

The Honorable Jenny Abbott Kitchings
SC Court of Appeals
PO Box 11629
Columbia, SC 29211

MAILING: 32 Ann Street, Charleston, South Carolina 29403

North Charleston: 2170 Ashley Phosphate Road, 3rd Floor, North Charleston, South Carolina 29406 * **Greenville:** 418 River Street, Greenville, SC 29601

Florence: 150 W. Evans Street, Florence, South Carolina 29501 * **Myrtle Beach:** 2411 N. Oak Street, Suite 407, Myrtle Beach, South Carolina 29577

Columbia: 1201 Main Street, Suite 1100, Columbia, South Carolina 29201 * **Raleigh, NC:** 8801 East Park Drive, Suite 301, Raleigh, NC 27617

Wilmington, NC: Appointment Only

Office of Court Administration
1015 Sumter St., Suite 200
Columbia, SC 29201



Camden Hodge <camden@akimlawfirm.com>

Allstate v. Natoshia Hamilton and Kenneth Coogler

1 message

Yvette Wideman <yvette@akimlawfirm.com>

Wed, Sep 12, 2018 at 5:19 PM

To: ksmith@sccourts.org

Cc: Camden Hodge <camden@akimlawfirm.com>, Team Hodge <TeamHodge@googlegroups.com>

Hello Ms. Smith.

I hope you are well on today.

Attached please see correspondence from J. Camden Hodge, Esq.

Sincerely,

Yvette Wideman

Litigation Paralegal to J. Camden Hodge, Esq.

Anastopoulo Law Firm, LLC

yvette@akimlawfirm.com

mailing address: 32 Ann Street | Charleston, SC 29403

physical address: 418 River Street | Greenville, SC 29601

Tel: 843-614-8888 | Fax: 843-494-5536

www.akimlawfirm.com

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 **Ltr To Court reporter requesting transcript (Natoshia Hamilton) (Signed).pdf**
429K

Exhibit 2



Camden Hodge <camden@akimlawfirm.com>

Re: Allstate v. Natoshia Hamilton and Kenneth Coogler, Case #2017-CP-21-00341

Smith, Krystal J. <krsmith@sccourts.org>

Wed, Sep 12, 2018 at 5:35 PM

To: Yvette Wideman <yvette@akimlawfirm.com>

Cc: Camden Hodge <camden@akimlawfirm.com>, Team Hodge <TeamHodge@googlegroups.com>, transcripts <transcripts@sccourts.org>

?Good afternoon,

This is to confirm that I have received your request and have added it to my list.

Thank you,

Krystal J. Smith

From: Yvette Wideman <yvette@akimlawfirm.com>
Sent: Wednesday, September 12, 2018 5:19 PM
To: Smith, Krystal J.
Cc: Camden Hodge; Team Hodge
Subject: Allstate v. Natoshia Hamilton and Kenneth Coogler

Hello Ms. Smith.

I hope you are well on today.

Attached please see correspondence from J. Camden Hodge, Esq.

Sincerely,

Yvette Wideman

Litigation Paralegal to J. Camden Hodge, Esq.

Anastopoulo Law Firm, LLC

yvette@akimlawfirm.com<mailto:yvette@akimlawfirm.com>

mailing address: 32 Ann Street | Charleston, SC 29403<https://urldefense.proofpoint.com/v2/url?u=https-3A__maps.google.com_-3Fq-3D32-2BAnn-2BStreet-2C-2BUnit-2BB-25C2-25A0-257C-25C2-25A0Charleston-2C-2BSC-2B29403-26entry-3Dgmail-26source-3Dg&d=DwMFAQ&c=YGvVmrQQ6VQOFx3Z93C9uQ&r=y3uZXIyx4EXf8tLfZIUy5iP9wX_M96S8j14tzSNuSyM&m=3osR_ICHBffkd_diyEuCb48t1yaNwGwjUFs1yNU25Pk&s=slxVBDX59TdZLPmi2p3Ccx1ofdQj8lxKLZps5J-Gaag&e=>

physical address: 418 River Street | Greenville, SC 29601<https://urldefense.proofpoint.com/v2/url?u=https-3A__maps.google.com_-3Fq-3D418-2BRiver-2BStreet-25C2-25A0-257C-2B Greenville-2C-2BSC-2B29601-26entry-3Dgmail-26source-3Dg&d=DwMFAQ&c=YGvVmrQQ6VQOFx3Z93C9uQ&r=y3uZXIyx4EXf8tLfZIUy5iP9wX_M96S8j14tzSNuSyM&m=3osR_ICHBffkd_diyEuCb48t1yaNwGwjUFs1yNU25Pk&s=>

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Tel: 843-614-8888<tel:(843)%20614-8888> | Fax: 843-494-5536<tel:(843)%20494-5536>

www.akimlawfirm.com<https://urldefense.proofpoint.com/v2/url?u=http-3A__www.akimlawfirm.com_&d=DwMFaQ&c=YGvVmrQQ6VQOFx3Z93C9uQ&r=y3uZXlyx4EXf8tLfZIUy5iP9wX_M96S8j14tzSNuSyM&m=3osR_IChBffkd_dlyEuCb48t1yaNwGwjUFs1yNU25Pk&s=XqeSJR2mQbLE4u7yo3d0TGa73EwVP-8H-3oQoqTZQc&e=>

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

---

APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

THE HONORABLE MICHAEL G. NETTLES, CIRCUIT COURT JUDGE

---

APPELLATE CASE NO.: 2018-001675

---

Allstate Property and Casualty  
Insurance Company,

Respondent,

v.

Natoshia Hamilton,

Appellant.

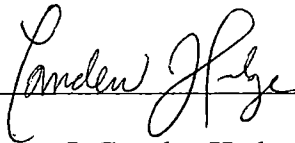
**AFFIDAVIT OF J. CAMDEN HODGE, ESQ.**

I, J. Camden Hodge, Esq., having been duly sworn, deposes and says:

1. That I am over the age of 18 years old and I am qualified to issue this affidavit.
2. That on September 12, 2018, I wrote to Krystal J. Smith and requested a transcript for the hearing in the underlying matter of Allstate Property and Casualty Insurance Company v. Natoshia Hamilton and Kenneth Coogler, 2017-CP-21-0341, which is the subject of this appeal.
3. That said request was made via USPS and email, and that Counsel for the Respondent, Court Administration, and the Clerk of Court for the South Carolina Court of Appeals were

provided with copies of the same.

4. That on September 12, 2018, Krystal J. Smith emailed me and stated that she received the request for transcript and added it to her list.

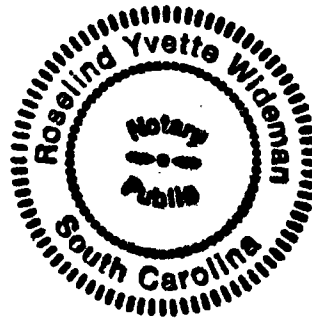
  
\_\_\_\_\_  
J. Camden Hodge, Esq.

Dated: October 12, 2018

State of SC County of Greenville

The foregoing instrument was acknowledged before me

This 12<sup>th</sup> day of October, 2018



  
(L.S.)

Notary Public Signature

My Commission Expires 02/18/2025



## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

V. CLAIRE ALLEN  
DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
[www.sccourts.org](http://www.sccourts.org)

October 03, 2018

Mr. Roy T. Willey, IV, Esquire  
32 Ann Street  
Charleston SC 29403

Mr. Eric Marc Poulin, Esquire  
32 Ann Street  
Charleston SC 29403


Mr. James Camden Hodge, Esquire  
32 Ann Street  
Charleston SC 29403

Re: Allstate Property v. Natoshia Hamilton  
Appellate Case No. 2018-001675

Dear Counsel:

Our records reflect that the time for ordering the transcript has expired. Within ten days of the date of this letter, you must file a copy of the letter showing that the transcript has been ordered directly from the court reporter, along with a motion requesting permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules. This appeal will be dismissed if no motion is made within ten days of the date of this letter.

Very truly yours,

  
CLERK

cc: Alfred Johnston Cox, Esquire

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

\_\_\_\_\_  
APPEAL FROM FLORENCE COUNTY  
Court of Common Pleas

THE HONORABLE MICHAEL G. NETTLES, CIRCUIT COURT JUDGE

\_\_\_\_\_  
APPELLATE CASE NO.: 2018-001675  
\_\_\_\_\_

Allstate Property and Casualty  
Insurance Company,

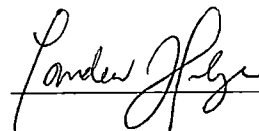
Respondent,

v.

Natoshia Hamilton,

Appellant.

I, J. Camden Hodge, Esq., affirm that I have served the Counsel for Respondent Allstate Property and Casualty Insurance Company, in the above entitled action, with Appellant's Motion for Extension of Time to Order Transcript.

  
\_\_\_\_\_  
J. Camden Hodge

October 12, 2018  
Greenville, SC

**RECEIVED**  
OCT 12 2018  
SC Court of Appeals