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THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**  
DEC 17 2018  
SC Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Case No. 2016-CP-40-02573

Jeanne Knollinger.....Appellant

v.

Ryan Noel Oliver.....Respondent

MOTION FOR EXTENSION OF TIME TO ORDER TRANSCRIPT OUTSIDE OF THE  
FILING DEADLINES SET BY RULE 207 OF THE SOUTH CAROLINA APPELLATE  
COURT RULES

Counsel for Appellant respectfully requests permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rule in this case. In support of this request, counsel shows:

1. Counsel for Appellant respectfully submits that extraordinary circumstances exist which warrant the granting of permission to order the transcript outside of the filing deadlines, including but not limited to counsel's heavy work-load.
2. Counsel has already requested the transcript in question and is filing proof of such request contemporaneously with this motion.
3. Counsel makes this request in good faith and not for purpose of delay.

WHEREFORE, the undersigned counsel would respectfully request permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules in this case based upon the above exigent circumstances.

Respectfully submitted,



---

Ryan C. Andrews  
Cobb, Dill & Hammett, LLC  
222 W. Coleman Blvd.  
Mt. Pleasant, SC 29464  
(843) 936-6680 (p)  
(843) 353-2488 (f)  
randrews@cdhlawfirm.com

Attorney for Appellant

December 12, 2018

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

Jocelyn Newman, Circuit Court Judge

Case No. 2016-CP-40-02573

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**PROOF OF SERVICE**

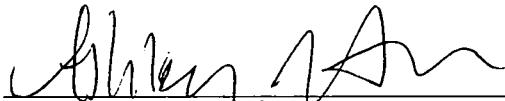
PERSONALLY appeared before me, Ryan C. Andrews, who being duly sworn, deposes and says that he has served the Motion for Permission to Order the Transcript Outside of the Filing Deadline and Correspondence to the Trial Court Reporter requesting the same on Ryan Noel Oliver by depositing a copy of it in the United States Mail, postage prepaid, on December 12, 2018, addressed to his attorneys of record, Langdon Cheves III and Sarah D. Hurley, Turner Padgett Graham & Laney, PA, PO Box 1509, Greenville, SC 29602.

December 12, 2018



Ryan C. Andrews  
Cobb Dill & Hammett, LLC  
222 W. Coleman Blvd.  
Mt. Pleasant, SC 29464  
(843) 936-6680  
Attorney for Appellant

SWORN AND SUBSCRIBED before me,  
this 12<sup>th</sup> day of December, 2018.



Notary Public for South Carolina  
My Commission Expires: 09/28/2027



Ryan C. Andrews, Partner (SC)  
Hal E. Cobb, Partner (SC/CO)  
Michael H. Dill, Partner (SC)  
William S. Hammett III, Partner (SC/GA)

Stefanie L. Huffer, Associate (SC)  
Bryan A. Raymond, Associate (SC)  
Stephanie M. Richards, Associate (SC)

Sean A. Scapellato, Partner (SC)  
David F. Shymansky Jr., Associate (SC/MD)  
Jeffrey A. Slocum Jr., Associate (SC)

December 12, 2018

**SENT VIA FIRST CLASS MAIL**

Honorable Jenny A. Kitchings  
Clerk, South Carolina Court of Appeals  
P.O. Box 11629  
Columbia, SC 29211

**RECEIVED**

**DEC 17 2018**

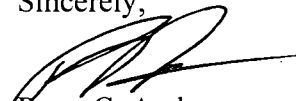
**SC Court of Appeals**

Re: *Jeanne Knollinger v. Ryan Noel Oliver*  
*Appellate Case No.: 2018-002095*

Dear Ms. Kitchings:

I am in receipt of your letter dated December 7, 2018, regarding the above-referenced appeal. Accordingly, enclosed for filing are the original and seven (7) copies of the Motion for Extension of Time to Order the Transcript Outside of the Filing Deadlines and eight (8) copies of the correspondence to the court reporter requesting the same. The \$50.00 filing fee is also enclosed. Please return a clocked copy of the enclosed documents in the envelope provided. Thank you very much and should you have any questions concerning the matter, please do not hesitate to contact me.

Sincerely,

  
Ryan C. Andrews  
Enclosures

Cc: Langdon Cheves III (w/ enclosures)  
Sarah Day Hurley (w/ enclosures)



**COBB DILL &  
HAMMETT, LLC**

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David F. Shymansky Jr., Associate (SC/MD)  
Jeffrey A. Slocum Jr., Associate (SC)

December 12, 2018

**SENT VIA EMAIL TO: MMANLEY@SCCOURTS.ORG**

Mona Manley  
Official Circuit Court Reporter  
South Carolina Judicial Department  
PO Box 4516  
Beaufort, SC 29903-4516

\* Sent via  
first class mail  
after email.

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**DEC 17 2018**

**SC Court of Appeals**

Re: *Jeanne Knollinger v. Ryan Noel Oliver et al.*  
Case No.: 2016-CP-40-2573

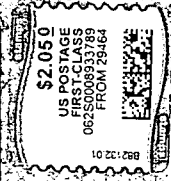
Dear Ms. Manley,

Please be advised that I represent the Plaintiff in the above referenced case. Please let this correspondence serve as a formal request for the complete trial transcript for the above referenced case. This case was heard in the Richland County Court of Common Pleas on September 4-5, 2018 before the Honorable Jocelyn Newman.

Thank you for your assistance with this matter, and should you have any questions, please do not hesitate to contact my office.

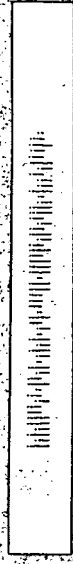
Sincerely,

  
Ryan C. Andrews, Esq.



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Clerk, SC Court of Appeals  
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& H HAMMETT, LLC  
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