

90072

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM HORRY COUNTY
Court of Common Pleas

The Honorable Benjamin H. Culbertson, Circuit Court Judge

RECEIVED
JUN 20 2019
SC Court of Appeals

Appellate Case No. 2019-000918
Case No. 2019-CP-26-00946

Lauren Egan, and Lauren K. Egan
2017 Irrevocable Trust,

.....Appellants

v.

Dockstreet at the Market Common, Inc.;
Dock Street Homes and Communities,
Inc.; Sands Building Group, Inc.;
Sterling Homes; Real Estate Modo Inc.;
Ocean Front Guru Real Estate
Sales & Development, Inc.; and
Brian Piercy, Defendants,

Of which Ocean Front Guru Real Estate
Sales and Development, Inc., and Brian
Piercy are the Respondents,

.....Respondents

APPELLANT'S MOTION FOR LEAVE
TO ORDER TRANSCRIPT OUTSIDE OF DEADLINE

Lauren Egan and Lauren K. Egan 2017 Irrevocable Trust ("Appellant") respectfully requests that this Court grant Appellant leave to order the transcripts outside the deadline specified in Rule 207. As shown below, and attached hereto as Exhibits A and B, Appellant ordered the transcript on May 29, 2019 and the court reporter acknowledged receipt of same. As of today's date, Appellant has not received the requested transcript.

June 19, 2019



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Lane D. Jefferies, Esquire
SC Bar No. 101764
Eric M. Poulin, Esquire
SC Bar No. 100209
Roy T. Willey, IV, Esquire
SC Bar No. 101010
Anastopoulo Law Firm, LLC
32 Ann Street
Charleston, SC 29403
(843) 614-8888
Attorneys for Appellant

Counsel of Record for Respondents:

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***Attorney for Ocean Front Guru Real Estate
Sales and Development, Inc., and Brian Piercy***

Counsel of Record for Defendants:

Danielle F. Payne
SC Bar No. 73142
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735 Johnnie Dodds Blvd, Suite 200
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Phone: (843) 576-2921
Attorney for Sands Building Group, Inc.

Sterling Homes
Not Represented

Marcus Griffin
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Lyles & Associates, LLC
342 East Bay
Charleston, SC 29401
Phone: (843) 577-5770
Attorney for Dockstreet at the Market Common, Inc.;
Dock Street Homes and Communities, Inc.

Andrew Preston Brittain
SC Bar No. 73707
The Brittain Law Firm, P.A.
4614 Oleander Dr.
Myrtle Beach, SC 29577-5736
Phone: (843) 449-8562
Attorney for Real Estate Modo Inc.

EXHIBIT A

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

REPLY TO ANN STREET OFFICE
KENNETH@AKIMLAWFIRM.COM

ANASTOPOULO

LAW FIRM

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ERIC M. POULIN (SC)(NC)(GA)(CA)
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J. CAMDEN HODGE (SC)
LANE D. JEFFERIES (SC)
THOMAS D. KANDLER, II (NC)
BYRON V. LEARY, II (SC)
BENJAMIN W. LEE (SC)
ALEXIS W. McCUMBER (SC)
MATTHEW L. NALL (SC)(KY)
INDIA D. SHAW (DC)
SAMANTHA SUTTON (SC)(NC)
CASEY VAN VALKENBURGH (SC)(IL)(MO)
P. HEATH WARD (SC)
DANNY LEE WILLARD, JR. (SC)
L. CRAYTON WILLIAMS (SC)

*OF COUNSEL

May 29, 2019

VIA US MAIL AND EMAIL

(ghurley@sccourts.org)

Ms. Grace L. Hurley
2960 Fowler School Road
Green Sea, SC 29545

RE: *Lauren Egan v. Dock Street at the Market Common, et al.*
Case No.: 2019-CP-26-00946

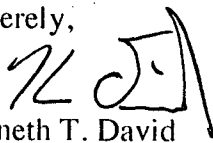
Dear Ms. Hurley:

Please provide us a transcript of the hearing related to Defendant, Ocean Front Guru Real Estate Sales & Development's Motion to Dismiss that was heard on April 25, 2019 by the Honorable Benjamin H. Culbertson.

Please let me know if you require payment in advance. I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

If you should have any questions, please do not hesitate to contact us.

Sincerely,



Kenneth T. David

Cc: Andrew Preston Brittain, Esq.
Marcus Griffin, Esq.
Danielle F. Payne, Esq.
Joseph D. Thompson, III, Esq.

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

EXHIBIT B



Donna Mills <scheduling@akimlawfirm.com>

Egan, Lauren v. Dock Street Communities, et al. - Case No. 2019-CP-26-00946

Hurley, Grace L. <GHurley@sccourts.org>
To: Donna Mills <scheduling@akimlawfirm.com>

Wed, May 29, 2019 at 4:18 PM

Request acknowledged.

Grace L. Hurley, CVR-CM-M
Circuit Reporter
2960 Fowler School Road
Green Sea, SC 29545

From: Donna Mills <scheduling@akimlawfirm.com>
Sent: Wednesday, May 29, 2019 2:48 PM
To: Hurley, Grace L.
Cc: TeamJefferies; preston@brittainlawfirm.com; mtg@lylesfirm.com; danielle.payne@mgclaw.com; Joseph Thompson, III
Subject: Egan, Lauren v. Dock Street Communities, et al. - Case No. 2019-CP-26-00946

*** EXTERNAL EMAIL: This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***

Ms. Hurley -

Please see the attached letter concerning the above referenced case. A hard copy will be mailed today.

Best -

Donna F. Mills
Litigation Paralegal

Anastopoulos Law Firm LLC
32 Ann Street | Charleston, SC 29403
Tel: 843-614-8888 | Fax: 843-853-2291

www.akimlawfirm.com<[Office Locations: Charleston | N. Charleston | Florence | Columbia | Greenville | Myrtle Beach | Raleigh, NC
By Appointment Only: Wilmington, NC](https://urldefense.proofpoint.com/v2/url?u=http-3A__www.akimlawfirm.com_&d=DwMFaQ&c=YGvVmrQQ6VQOFx3Z93C9uQ&r=L7rjNVA7qnkru4ZEJ757KhbAI5v79LL5Wgy-rj5emQ8&m=bETgCYshj8BG5sOLxCHXQStZqbE3kOwLtZ2luDIHILQ&s=M2I4w54DSrj1lmiK2byS1RwOBi2OCupmOpuS6fh8TrE&e=>|dmills@akimlawfirm.com<mailto:Roy@akimlawfirm.com></p></div><div data-bbox=)

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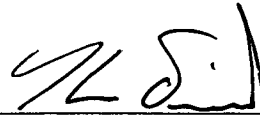
Of which Ocean Front Guru Real Estate  
Sales and Development, Inc., and Brian  
Piercy are the Respondents, .....Respondents

PROOF OF SERVICE FOR APPELLANT’S MOTION FOR LEAVE  
TO ORDER TRANSCRIPT OUTSIDE OF DEADLINE

I certify that Appellant’s Motion for Leave to order transcript outside of the deadline pursuant to Rule 207 was served on Respondents by U.S. Mail Postage Prepaid on June 19, 2019, addressed to Respondents’ attorney of record, Joseph D. Thompson, III.

June 19, 2019

[Signature on following page]



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Kenneth T. David, Esquire  
Lane D. Jefferies, Esquire  
Eric M. Poulin, Esquire  
Roy T. Willey, IV, Esquire  
Anastopoulo Law Firm, LLC  
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Attorney for Appellant

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# ANASTOPOULO

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P. HEATH WARD (SC)  
DANNY LEE WILLARD, JR. (SC)  
L. CRAYTON WILLIAMS (SC)

\*OF COUNSEL

June 19, 2019

**Via Hand Delivery**

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

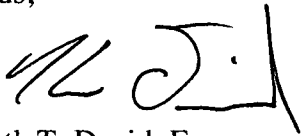
RE: *Lauren Egan v. Dock Street at the Market Common, et al.*  
Case No.: 2019-CP-26-00946  
Appellate Case No.: 2019-000918

Dear Ms. Kitchings:

Enclosed for filing please find the original and six (6) copies of Appellant's Motion for Leave to Order Transcript Outside of the Deadline pursuant to rule 207. Also enclosed please find a check in the amount of \$50.00 for the filing fee of same.

If you should have any questions, please do not hesitate to contact us.

Regards,



Kenneth T. David, Esq.

Enclosures as stated

Cc: Joseph D. Thompson, III, Esq. (Via U.S. Mail and Email)

**RECEIVED**

JUN 20 2019

SC Court of Appeals

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