

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

R. Keith Kelly, Circuit Court Judge

Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Jackie Eadon Chalfant,  
Individually and as Personal  
Representative of the Estate of  
Michael Dallas Chalfant,

Appellant,

v.

Carolinas Dermatology  
Group, P.A., a South Carolina  
Professional Association, and  
Mark G. Blaskis, M.D.,  
Individually.

Respondent.

RECEIVED

SEP 03 2019

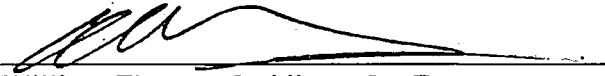
SC Court of Appeals

APPELLANT'S NOTICE OF FILING AND COMPLIANCE WITH  
RULE 207, SCACR

Appellant, Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas Chalfant, hereby gives Notice of Filing and Compliance with Rule 207, SCACR and Clerk's Letter directives dated July 26, 2019 and hereby files all copies of all communications/correspondence with the court reporter, Bonnie R. Kelly, CVR, regarding ordering of the entire transcript of trial proceedings on July 9, 2019.

August 29, 2019

Other Counsel of Record:  
Martin S. Driggers, Jr., Esq.  
SWEENY, WINGATE & BARROW, P.A.  
115 Cargill Way, Suite B  
Hartsville, South Carolina 29550  
Phone: (843) 878-0390  
E-mail: [MSD@swblaw.com](mailto:MSD@swblaw.com)  
Attorney for Respondent

  
William Thomas Geddings, Jr., Esq.  
GEDDINGS LAW FIRM, P.A.  
20 Brooks Street  
Manning, SC 29102  
Phone: (803) 435-4770  
E-mail: [wgeddings@geddingslawfirm.com](mailto:wgeddings@geddingslawfirm.com)  
Attorney for Appellant

# Geddings Law Firm, PA

20 South Brooks Street  
Manning, South Carolina 29102

W. T. Geddings, Jr.\*

\* also admitted to practice in Georgia

(803) 435-4770

FAX: (803) 435-2841

E-Mail: [WTG@GeddingsLawFirm.com](mailto:WTG@GeddingsLawFirm.com)

FED ID # 57-1117536

July 29, 2019

Bonnie Kelly, CVR  
P.O Box 50614  
Columbia, South Carolina 29250

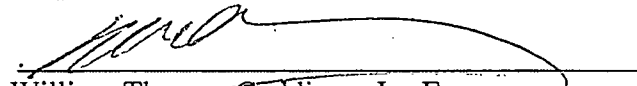
Re: Jackie Eadon Chalfant, Individually, and as Personal Representative of the Estate of Michael Dallas Chalfant v. Carolinas Dermatology Group, P.A. & Mark G. Blaskis, M.D.  
Lower Court Case number: 2017-CP-40-00517  
Appellate Case Number: 2019-001145

Dear Ms. Kelly:

This will confirm we have ordered the entire transcript of the trial proceedings in the above matter which tried before the Honorable R. Keith Kelly during the week of June 3, 2019. We have forwarded to you under separate cover from Pro Hoc Vice, Michael G. Fink, Esq. enclosed herein his firm's check in the amount of \$3,291.25 as payment in full per your request.

Should you have any questions or need any further information, please do not hesitate to contact me. Thank you for your assistance in this matter.

Respectfully,



~~William Thomas Geddings, Jr., Esq.~~

GEDDINGS LAW FIRM, P.A.

20 Brooks Street

Manning, SC 29102

Phone: (803) 435-4770

E-mail: [wgeddings@geddingslawfirm.com](mailto:wgeddings@geddingslawfirm.com)

Attorney for Appellant

cc: Martin S. Driggers, Jr., Esq.  
SWEENY, WINGATE & BARROW, P.A.  
115 Cargill Way, Suite B  
Hartsville, South Carolina 29550  
Phone: (843) 878-0390  
E-mail: [MSD@swblaw.com](mailto:MSD@swblaw.com)  
Attorney for Respondent

Michael G. Fink, Esq.  
MIKE FINK LAW FIRM, P.A.  
1500 Royal Palm Square Boulevard, Unit 101  
Fort Myers, Florida 33919  
Phone: (239) 939-1906  
E-mail: [Mfink@MikeFinkLaw.net](mailto:Mfink@MikeFinkLaw.net)  
Pro Hac Vice Attorney for Appellant

South Carolina Office of Court Administration  
1220 Senate Street, Suite 201  
Columbia, SC 29201

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

# Geddings Law Firm, PA

20 South Brooks Street  
Manning, South Carolina 29102

COMPOSITE EXHIBIT "C"

W. T. Geddings, Jr.\*

\* also admitted to practice in Georgia

(803) 435-4770

FAX: (803) 435-2841

E-Mail: [WTG@GeddingsLawFirm.com](mailto:WTG@GeddingsLawFirm.com)

FED ID # 57-1117536

July 30, 2019

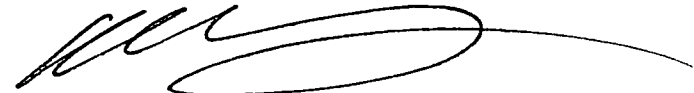
South Carolina Office of Court Administration  
120 Senate Street, Suite 201  
Columbia, South Carolina 29201

RE: Jackie Eadon Chalfant, Individually and as Personal Representative of the Estate of Michael Dallas Chalfant, Appellant, v. Carolinas Dermatology Group, P.A., a South Carolina Professional Association, and Mark G. Blaskis, M.D., Individually, Respondent.  
Appellate Case No. 2019-001145 / Lower Case No. 2017-CP-40-00517

Dear Sir or Madam:

Enclosed please find a true and correct copy of the Appellant's Notice of Filing and Compliance with Rule 207, SCACR and with the Clerk's letter directives dated July 26, 2019 providing copies of all communications/correspondence with the court reporter, Bonnie R. Kelly regarding the ordering of the entire transcript of the trial proceedings on July 9, 2019.

Sincerely,



William Thomas Geddings, Jr., Esq.

GEDDINGS LAW FIRM, P.A.

20 Brooks Street

Manning, SC 29102

Phone: (803) 435-4770

E-mail: [wgeddings@geddingslawfirm.com](mailto:wgeddings@geddingslawfirm.com)

Attorney for Appellant

cc: Martin S. Driggers, Jr., Esq.  
SWEENEY, WINGATE & BARROW, P.A.  
115 Cargill Way, Suite B  
Hartsville, South Carolina 29550  
Phone: (843) 878-0390  
E-mail: [MSD@swblaw.com](mailto:MSD@swblaw.com)  
Attorney for Respondent

**Subject:** Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings  
**Date:** Monday, July 29, 2019 at 12:25:11 PM Eastern Daylight Time  
**From:** Kelly, Bonnie <bkelly@sccourts.org>  
**To:** Mike Fink <mfink@mikefinklaw.net>  
**Attachments:** image001.png

Sounds good. Thanks!

Bonnie H. Kelly, CVR  
Official Court Reporter  
5th Circuit - At-large

---

From: Mike Fink <mfink@mikefinklaw.net>  
Sent: Monday, July 29, 2019 12:23:17 PM  
To: Kelly, Bonnie  
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

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

I'm mailing the attached check today for our request for the entire trial transcript.

Let me know if you need anything from our end. Because it is late, we are required to file a Motion For Permission to Order Transcript Outside of the Filing Deadlines along with our letter transmitting payment. Please hold the funds and don't start preparing the transcript wait until we get appellate court approval to order the transcript late. I assume it will be no problem.

Respectfully,

Michael G. Fink, Esq.  
MIKE FINK LAW FIRM  
Florida Bar Number: 0825743  
1500 Royal Palm Square Blvd., Unit 101  
Fort Myers, Florida 33919  
Phone: (239) 939-1906<tel:%28239%29%20939-1906>  
Cell: (239) 826-9010  
Email: [MFink@MikeFinkLaw.net](mailto:MFink@MikeFinkLaw.net)<mailto:MFink@MikeFinkLaw.net>

[id:image001.png@01D256C0.200B5990]

CONFIDENTIALITY NOTICE: The information transmitted is intended only for the person or entity to which it is addressed and contains confidential and/or privileged material. Any review, retransmission, dissemination or other use, including taking any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error please contact the sender, destroy all copies and delete the material from your computer and all other media upon which this email may be stored.

CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this e-mail, including attachments to this e-mail, is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this e-mail or attachment.

From: "Kelly, Bonnie" <[bkelly@sccourts.org](mailto:bkelly@sccourts.org)>  
Date: Monday, July 29, 2019 at 10:45 AM  
To: Michael Fink <[mfink@mikefinklaw.net](mailto:mfink@mikefinklaw.net)>  
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

Hey, I can't use an Amex card, but I do accept PayPal payments. You can go to PayPal and type in my user name, [bonniekelly21@gmail.com](mailto:bonniekelly21@gmail.com)<<mailto:bonniekelly21@gmail.com>>. Then select FRIENDS AND FAMILY so there's no fee, and payment is sent to me immediately. If you'd rather pay by check, that's fine, too. PO BOX 50614 Columbia, SC 29250

That is TERRIBLE about your associate. I hope he is improving daily.

Bonnie H. Kelly, CVR  
Official Court Reporter  
5th Circuit - At-large

---

From: Mike Fink <[mfink@mikefinklaw.net](mailto:mfink@mikefinklaw.net)<<mailto:mfink@mikefinklaw.net>>>  
Sent: Monday, July 29, 2019 7:37:03 AM  
To: Kelly, Bonnie  
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

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

I apologize, I thought we had paid this. My associate Andrew who appeared at trial sustained a head injury and has been unable to work.

Can you use my AmEx card? ~~7155-5660~~ 2004, exp 7/22, code ~~45~~

If not, please let me know and we will get a check out today.

Respectfully,

Michael G. Fink, Esq.  
MIKE FINK LAW FIRM  
Florida Bar Number: 0825743  
1500 Royal Palm Square Blvd., Unit 101  
Fort Myers, Florida 33919  
Phone: (239) 939-1906<<tel:%28239%29%20939-1906>>  
Cell: (239) 826-9010  
Email: [MFink@MikeFinkLaw.net](mailto:MFink@MikeFinkLaw.net)<<mailto:MFink@MikeFinkLaw.net>><<mailto:MFink@MikeFinkLaw.net>>

[[id:image001.png@01D256C0.200B5990](mailto:image001.png@01D256C0.200B5990)<<mailto:image001.png@01D256C0.200B5990>>]

CONFIDENTIALITY NOTICE: The information transmitted is intended only for the person or entity to which it is addressed and contains confidential and/or privileged material. Any review, retransmission, dissemination or other use, including taking any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error please contact the sender, destroy all copies and delete the material from your computer and all other media upon which this email may be stored.

CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this e-mail, including attachments to this e-mail, is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any

transaction or matter addressed in this e-mail or attachment.

From: "Kelly, Bonnie" <[bkelly@sccourts.org](mailto:bkelly@sccourts.org)<<mailto:bkelly@sccourts.org>>>  
Date: Wednesday, July 17, 2019 at 3:11 PM  
To: Michael Fink <[mfink@mikefinklaw.net](mailto:mfink@mikefinklaw.net)<<mailto:mfink@mikefinklaw.net>>>  
Subject: RE: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

Hey, Mike. I haven't yet received payment for the transcript and as I indicated in my email, advance payment is required prior to transfer production. I was wondering if you might check on the status of payment. Thanks so much!  
Bonnie H. Kelly, CVR  
Official Court Reporter  
5th Circuit - At-large

From: Mike Fink [[mfink@mikefinklaw.net](mailto:mfink@mikefinklaw.net)<<mailto:mfink@mikefinklaw.net>><<mailto:mfink@mikefinklaw.net>>  
<<mailto:mfink@mikefinklaw.net%3e>>]  
Sent: Tuesday, July 9, 2019 10:26 AM  
To: Kelly, Bonnie  
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

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

We filed the Notice of Appeal yesterday. So, the entire transcript is required.

Respectfully,

Michael G. Fink, Esq.  
MIKE FINK LAW FIRM  
Florida Bar Number: 0825743  
1500 Royal Palm Square Blvd., Unit 101  
Fort Myers, Florida 33919  
Phone: (239) 939-1906<<tel:%28239%29%20939-1906>>  
Cell: (239) 826-9010  
Email: [MFink@MikeFinkLaw.net](mailto:MFink@MikeFinkLaw.net)<<mailto:MFink@MikeFinkLaw.net>><<mailto:MFink@MikeFinkLaw.net>>  
<<mailto:MFink@MikeFinkLaw.net%3e%3cmailto:MFink@MikeFinkLaw.net%3e>>>

ORDERED

[[image001.png@01D256C0.200B5990](mailto:image001.png@01D256C0.200B5990)<<mailto:image001.png@01D256C0.200B5990>>  
<<mailto:image001.png@01D256C0.200B5990%3e>>]

CONFIDENTIALITY NOTICE: The information transmitted is intended only for the person or entity to which it is addressed and contains confidential and/or privileged material. Any review, retransmission, dissemination or other use, including taking any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error please contact the sender, destroy all copies and delete the material from your computer and all other media upon which this email may be stored.

CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this e-mail, including attachments to this e-mail, is not intended or written to be used, and cannot be used, by any person for the purpose of (i) avoiding penalties under the U.S. Internal Revenue Code, or (ii) promoting, marketing or recommending to another party any transaction or matter addressed in this e-mail or attachment.

From: "Kelly, Bonnie" <[bkelly@sccourts.org](mailto:bkelly@sccourts.org)<<mailto:bkelly@sccourts.org>><<mailto:bkelly@sccourts.org>>  
<<mailto:bkelly@sccourts.org%3e>>>

Date: Monday, July 8, 2019 at 9:30 PM  
To: Andrew Walker <[awalker@mikefinklaw.net](mailto:awalker@mikefinklaw.net)<<mailto:awalker@mikefinklaw.net>>  
<<mailto:awalker@mikefinklaw.net>><<mailto:awalker@mikefinklaw.net%3e>>>  
Subject: Re: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

I have not heard from you regarding production of the excerpts of this trial and was wondering if you have decided not to proceed. Thanks.

Bonnie H. Kelly, CVR  
Official Court Reporter  
5th Circuit - At-large

→ Exhibit "A" Court Rpt 6/13/19 8:55:04 PM EMAIL Goes here ←

From: Andrew Walker <[awalker@mikefinklaw.net](mailto:awalker@mikefinklaw.net)<<mailto:awalker@mikefinklaw.net>>  
<<mailto:awalker@mikefinklaw.net>><<mailto:awalker@mikefinklaw.net>><<mailto:awalker@mikefinklaw.net%3e>>  
<<mailto:awalker@mikefinklaw.net%3e%3cmailto:awalker@mikefinklaw.net%3e%3cmailto:awalker@mikefinklaw.net%3e%3e>>>

Sent: Thursday, June 13, 2019 11:26 AM  
To: Kelly, Bonnie  
Subject: RE: Chalfant v. Carolinas Dermatology Group - Transcript from Proceedings

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

Perfect. For now we are requesting estimates for:

Dr. Mark Blaskis (all testimony)  
Dr. Sean Christensen (all testimony)  
The Motions and rulings from June 6, 2019

Can we also get an estimate for the entire transcript so we are aware, as we will need that eventually.

Respectfully,

Andrew Walker, Esq.

MIKE FINK LAW FIRM, P. A.  
1500 Royal Palm Square Blvd., Unit 101  
Fort Myers, Florida 33919

E-Mail: [AWalker@MikeFinkLaw.net](mailto:AWalker@MikeFinkLaw.net)<<mailto:AWalker@MikeFinkLaw.net>><<mailto:AWalker@MikeFinkLaw.net>>  
<<mailto:AWalker@MikeFinkLaw.net>><<mailto:AWalker@MikeFinkLaw.net%3e%3cmailto:AWalker@MikeFinkLaw.net%3e%3e>>>

Service E-Mail: [Eservice@MikeFinkLaw.net](mailto:Eservice@MikeFinkLaw.net)<<mailto:Eservice@MikeFinkLaw.net>>  
<<mailto:Eservice@MikeFinkLaw.net>>

<<mailto:Eservice@MikeFinkLaw.net%3e%3cmailto:Eservice@MikeFinkLaw.net%3e%3e>>>

Phone: (239) 939-1906  
Fax: (239) 939-1915

CONFIDENTIALITY NOTICE: The information transmitted is intended only for the person or entity to which it is addressed and contains confidential and/or privileged material. Any review, retransmission, dissemination or other use, including taking any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error please contact the sender, destroy all copies and delete the material from your computer and all other media upon which this email may be stored.

CIRCULAR 230 NOTICE: To comply with U.S. Treasury Department and IRS regulations, we are required to advise you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this e-mail, including attachments





Subject: Estimated costs to produce excerpts from Chalfant trial  
Date: Thursday, June 13, 2019 at 8:55:04 PM Eastern Daylight Time  
From: Bonnie Kelly <bonniekelly21@gmail.com>  
To: Andrew Walker <awalker@mikefinklaw.net>

6/13/19  
8:55 AM  
EMAIL

Good evening, Mr. Walker. The following are estimates to produce the requested portions of the trial transcript as requested:

	Normal Production	Expedited Production
Dr. Blaskis	\$306.00	360.00
Dr. Christensen	\$318.75	375.00
Motions from 6/6/19	\$306.00	360.00
Transcript in toto	\$3,291.25	N/A

I did not include the proffered testimony of Dr. Blaskis that was done on 6/6/19, nor did I include the motion to allow him to be recalled just prior to that proffer. That would increase the motions amount to approximately \$360/410 if you need that as well.

The estimated amounts do not include postage. That will be in the neighborhood of \$20, I suspect. E-tran is \$40, but it's quicker and we don't have to involve USPS (not always the most reliable peeps in my experience unfortunately.)

Advanced payment is required prior transcript production, and according to our rules, I have 60 days from date of receipt of payment in which to produce the transcript.

I could produce the smaller sections on an expedited basis (seven [7] business days from date of receipt of payment) but I could not produce the entire transcript in 7 days because of my time in court, travel, etc.

My mailing address is PO BOX 50614, Columbia, SC 29250. Please advise as to how you'd like to proceed. Thank you for allowing me to be of service.

Bonnie Kelly, CVR  
PO Box 50614  
Columbia, SC 29250