

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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**APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
THE HONORABLE L. CASEY MANNING  
Circuit Court Judge  
Fifth Judicial Circuit**

**RECEIVED**

SEP 06 2019

SC Court of Appeals

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CASE NO: 2018-CP-400-5641

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RONALD I. PAUL.....Appellant,

V.

SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION; PAUL D. DE HOLCZER, individually and as a partner of the law Firm of Moses, Koon & Brackett, PC; MICHAEL H. QUINN, individually and as senior lawyer of Quinn Law Firm, LLC; J. CHARLES ORMOND, JR., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner; OSCAR K. RUCKER, in his individual capacity as, Director Rights of Way South Carolina Department of Transportation; MACIE M. GRESHAM, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; NATALIE J. MOORE, in her individual capacity as assistant chief counsel South Carolina Department of Transportation..... Respondents.

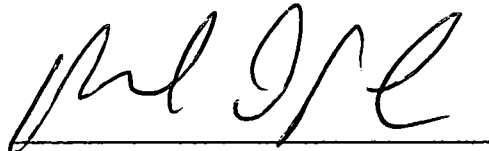
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**Notice That Transcript Has Been Received**

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On July 1, 2019, the transcript of the proceedings in this case was ordered. (Exhibit A)

On September 5, 2019, appellant received the transcript from the court reporter. (Exhibit B)



Ronald I. Paul  
Post Office Box 4353  
Columbia, S.C. 29240  
(803) 414-2305  
Appellant, *Pro Se* litigant

Other Counsel of Record:

ANDREW F. LINDEMANN  
LINDEMANN, DAVIS & HUGHES, P.A.  
5 Calendar Court, Suite 202  
P.O. Box 6923  
Columbia, South Carolina 29260  
Attorney for Defendants South Carolina Department of Transportation,  
Oscar K. Rucker, Macie M. Gresham, Natalie J. Moore and Paul D. de Holczer.

MICHAEL H. QUINN  
QUINN LAW FIRM, LLC  
2019 Park Street  
Post Office Box 6903  
Columbia, South Carolina 29260  
Attorney for Michael H. Quinn, individually, and as senior lawyer of Quinn  
Law Firm, LLC

J. CHARLES ORMOND, JR.,  
ORMOND - DUNN  
301 Stoneridge Drive  
Columbia, South Carolina 29210  
Attorney for J. Charles Ormond, Jr., individually, and as a partner of the  
Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner

B. MICHAEL BRACKETT  
MOSES KOON & BRACKETT, PC  
133 Brooksprings Rd.  
Columbia, South Carolina 29223  
Attorney for the law Firm of Moses, Koon & Brackett, P.C.

# **Exhibit**

**A**

**Re: Request for Transcript of Record RE: Ronald I. Paul vs. South Carolina Department of Transportations, et al., Case No. 2018-CP-400-5641**

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From: Harris, Elizabeth B. (EHarris@sccourts.org)

To: ronaldipaul@att.net

Date: Wednesday, July 3, 2019, 08:51 PM EDT

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Dr. Mr. Paul,

Your check arrived today, so please consider your transcript ordered as of 7-03-2019.

Cordially,

Elizabeth B. Harris, CVR-M-CM

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From: Harris, Elizabeth B.  
Sent: Tuesday, July 2, 2019 4:01:05 PM  
To: Ronald Paul  
Subject: Re: Request for Transcript of Record RE: Ronald I. Paul vs. South Carolina Department of Transportations, et al., Case No. 2018-CP-400-5641

Excellent. I will let you know the day your check arrives.

Cordially,

Elizabeth Harris

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From: Ronald Paul <[ronaldipaul@att.net](mailto:ronaldipaul@att.net)>  
Sent: Tuesday, July 2, 2019 3:19:27 PM  
To: Harris, Elizabeth B.  
Subject: Re: Request for Transcript of Record RE: Ronald I. Paul vs. South Carolina Department of Transportations, et al., Case No. 2018-CP-400-5641

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

Ms. Harris,

I mailed \$125 dollars to you today. I would like to have both, the hardcopy mail to me and, email me a PDF copy.

Thanking you in advance,

Mailing address

Ronald I. Paul  
Post Office Box 4353

Columbia South Carolina 29240  
(803) 414-2303

On Monday, July 1, 2019, 06:48:21 PM EDT, Harris, Elizabeth B. <EHarris@sccourts.org> wrote:

Dear Mr. Paul,

Thank you for your transcript request. I have reviewed my records and estimate your work will be 20 pages. Based on the current rate of \$4.25 per page, the cost will be \$85.00.

Under our rules, I have 60 days in which to complete the work. Upon receipt of a certified check or money order (no personal checks, please), the 60 days begin. Please be sure to include the case name and date of the hearing with your check, and send it to my address below.

If I have underestimated the number of pages, I will contact you for further payment before sending the transcript. If I have overestimated the number of pages, I will include reimbursement.

In the event I need additional time to complete the transcript, I will request an extension from Court Administration, who will notify you if the request is granted.

Finally, please advise me if you would prefer a hardcopy in the mail, or if you would instead like an emailed PDF. There is no difference in the charge. If you would like both, there will be an additional \$40.00 email charge.

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

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From: Ronald Paul <ronaldipaul@att.net<mailto:ronaldipaul@att.net>>  
Sent: Monday, July 1, 2019 9:35:17 AM  
To: Harris, Elizabeth B.  
Subject: Request for Transcript of Record RE: Ronald I. Paul vs. South Carolina Department of Transportations, et al., Case No. 2018-CP-400-5641

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

Dear Ms. Harris:

On April 16, 2019, the above case was tried before the Honorable L. Casey Manning, Circuit Court Judge, in Richland County (Ronald I. Paul vs. South Carolina Department of Transportations, et al., Case No. 2018-CP-400-5641). My records indicate that you were the court reporter for this case.

I request that you provide me with a transcript of the proceedings. Please transcribe the entire record.

- (1) Selection and swearing of the jury;
- (2) Opening statements of counsel for appellant and respondent;
- (3) Closing arguments of counsel for appellant and respondent].

I agree to pay the per page charge for this transcript as provided by Rule 607, SCACR.

Sincerely

Ronald I. Paul

Post Office Box 4353

Columbia, S. C. 29240

(803) 414-2303

Pro Se

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# **Exhibit**

# **B**

## Re: Transcript Question

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From: Harris, Elizabeth B. (EHarris@sccourts.org)  
To: ronaldipaul@att.net  
Date: Thursday, September 5, 2019, 10:17 PM EDT

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Dear Mr. Paul,

Good evening. I've just returned home and found your check, so please find attached your transcript. I will put your hardcopy in the mail Friday morning.

Cordially,

Elizabeth B. Harris, CVR-M-CM

Court Reporter to the Hon. L. Casey Manning

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From: Harris, Elizabeth B.  
Sent: Tuesday, September 3, 2019 3:49:53 PM  
To: Ronald Paul  
Subject: Re: Transcript Question

Thank you. Mail is usually delivered in town in a day, so I'm sure we'll be fine.

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From: Ronald Paul <ronaldipaul@att.net>  
Sent: Tuesday, September 3, 2019 3:39:23 PM  
To: Harris, Elizabeth B.  
Subject: Re: Transcript Question

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

Ms. Harris,

I mailed \$ 63.75 dollars to you today at or about 3:15 pm.

Thanking you in advance,

Mailing address

Ronald I. Paul  
Post Office Box 4353  
Columbia South Carolina 29240  
(803) 414-2303

On Tuesday, September 3, 2019, 12:54:08 PM EDT, Harris, Elizabeth B. <EHarris@sccourts.org> wrote:

Dear Mr. Paul:

I have completed your transcript, but I'm afraid I underestimated by 15 pages, for a total of 35. I will require a final payment of \$63.75 in a cashier's or certified check before I can release the work.

I will be leaving town Friday morning for the weekend. If you would like to deliver the check to my home before then (sometimes the mail can run a bit slow), we can make arrangements for a time when I will be here to accept delivery of your check. I can give you your transcript, then send the emailed version. Otherwise, through the mail is fine.

Cordially,  
Elizabeth B. Harris, CVR-M-CM  
Court Reporter to the Hon. 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.



PAUL vs SCDOT.2019.pdf

130.1kB

**THE STATE OF SOUTH CAROLINA  
In the Court of Appeals**

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APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas  
THE HONORABLE L. CASEY MANNING  
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CASE NO: 2018-CP-400-5641

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V.

SOUTH CAROLINA DEPARTMENT OF TRANSPORTATION; PAUL D. DE HOLCZER, individually and as a partner of the law Firm of Moses, Koon & Brackett, PC; MICHAEL H. QUINN, individually and as senior lawyer of Quinn Law Firm, LLC; J. CHARLES ORMOND, JR., individually and as a partner of the Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner; OSCAR K. RUCKER, in his individual capacity as, Director Rights of Way South Carolina Department of Transportation; MACIE M. GRESHAM, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; NATALIE J. MOORE, in her individual capacity as assistant chief counsel South Carolina Department of Transportation..... Respondents.

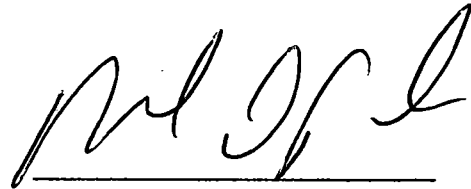
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**PROOF OF SERVICE**

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I, Ronald I. Paul hereby certify that I have served the Appellant Notice That Transcript Has Been Received on all Respondents South Carolina Department of Transportation; Paul D. de Holczer individually, and as a partner of the law Firm of Moses, Koon & Brackett, P.C; Michael H. Quinn, individually and as senior lawyer of Quinn Law Firm, LLC; J. Charles Ormond, Jr., individually and as a partner of the Law Firm of Holler, Dennis,

Corbett, Ormond, Plant & Garner; Oscar K. Rucker, in his individual capacity as, Director Rights of Way South Carolina Department of Transportation; Macie M. Gresham, in her individual capacity as Eastern Region Right of Way Program Manager South Carolina Department of Transportation; Natalie J. Moore, in her individual capacity as assistant chief counsel South Carolina Department of Transportation by depositing a copy of it in the United State Mail, postage prepaid, on this date, September 6, 2019, addressed to the attorney of record or *Pro Se* Litigants and others as listed below.



Ronald I. Paul  
Post Office Box 4353  
Columbia, South Carolina 29240  
(803) 414-2305  
Appellant, *Pro Se* Litigant

**SOUTH CAROLINA COURT ADMINISTRATION**

MICHELE OWENS  
1220 Senate Street  
Suite 200  
Columbia South Carolina, 29201

**RESPONDENTS COUNSEL OF RECORD**

ANDREW F. LINDEMANN  
LINDEMANN, DAVIS & HUGHES, P.A.  
5 Calendar Court, Suite 202  
P.O. Box 6923  
Columbia, South Carolina 29260  
Attorney for Defendants South Carolina Department of Transportation,  
Oscar K. Rucker, Macie M. Gresham, Natalie J. Moore and Paul D. de Holczer.

**MICHAEL H. QUINN**  
**QUINN LAW FIRM, LLC**  
2019 Park Street  
Post Office Box 6903  
Columbia, South Carolina 29260  
Attorney for Michael H. Quinn, Individually, and as senior lawyer of Quinn  
Law Firm, LLC

**J. CHARLES ORMOND, JR.,**  
**ORMOND - DUNN**  
301 Stoneridge Drive  
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Attorney for J. Charles Ormond, Jr., individually, and as a partner of the  
Law Firm of Holler, Dennis, Corbett, Ormond, Plant & Garner

**B. MICHAEL BRACKETT**  
**MOSES KOON & BRACKETT, PC**  
133 Brooksprings Rd.  
Columbia, South Carolina 29223  
Attorney the law Firm of Moses, Koon & Brackett, P.C.