

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

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

CASE NO: 2018-CP-400-5641

**RECEIVED
DEC 20 2019
SC Court of Appeals**

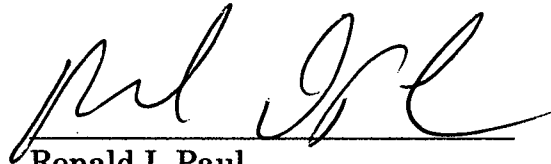
RONALD I. PAUL.....Appellant,

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.**

REQUEST FOR TRANSCRIPT OF RECORD

The attached email shows the transcript of record has been ordered
from the court reporter on November 2, 2019.



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

December 20, 2019
Columbia, South Carolina

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
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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

Re: Request For Transcript Record

ronaldipaul@att../Inbox



Kelly, Bonnie <bkelly@sccourts.org>
To: Ronald Paul <ronaldipaul@att.net>
Cc: Transcripts <transcripts@sccourts.org>

Nov 22 at 2:01 PM

I am not going to make the 5 pm time I said earlier, but you will have the transcript later this evening. I have never had something that has made me this sick before. And learning that my typist had not done her work was hard to take. I'd already paid her, but she just let it fall through the cracks, I guess.

Again, thank you for your patience!

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

From: Kelly, Bonnie
Sent: Friday, November 22, 2019 10:10:39 AM
To: Ronald Paul
Cc: Transcripts
Subject: Re: Request For Transcript Record

I apologize, Mr. Paul. I had a relapse w/my pneumonia and was bedridden since we last chatted by email. I have proofed about 1/3 of the typist's work and as I scanned through it, I realized she had not completed it. I was horrified. She, of course, has been let go from my employment. Honestly, people cannot be trusted for much any more, can they. And I feel like you probably feel that way about me, but please know I am making every effort to finish this for you. I hope to have it completed today by 5 pm.

Also, you paid for an expedited transcript, so I will be refunding some of money to you as soon as I finish. I don't know exactly how many pages a transcript will be until I actually complete it. I can estimate how many based on how long the hearing or trial was, but actual page count determines the actual cost.

You paid me \$5/pg based on a transcript that would be 61 pgs. If that page count is correct, I will refund you \$45.75, which is based on the regular production rate of \$4.25/pg. There is an e-tran fee of \$40 as well. I usually send by e-tran because it's immediate and it saves the postage and any delays by the USPS (which tend to happen more and more these days.)

Thank you SO much for your patience with me. Pneumonia is NO fun, and I know your waiting on me has not been fun either. You will have the transcript in your in-box by 5 pm today.

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

From: Ronald Paul <ronaldipaul@att.net>
Sent: Thursday, November 21, 2019 9:43:10 AM
To: Kelly, Bonnie
Cc: Transcripts
Subject: Re: Request For Transcript Record

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

Good morning Ms. Kelly,

Request current updated status on Transcript of Record, as of today November 21, 2019, I have not received the Transcript of Record.

Thinking you in advance,

Ronald I. Paul

On Wednesday, November 20, 2019, 12:39:58 PM EST, Kelly, Bonnie <bkelly@sccourts.org> wrote:

I am so sorry, Mr. Paul. I have been diagnosed with pneumonia since late October and have not been getting any better. My typist got way behind and only sent me what she had typed when I demanded it (yes, had to demand it) over the weekend and she sent it to me Monday morning via email.

I plan to proof her work today and have it out to you tonight. I was at the doctor's for a long time yesterday (still have pneumonia!) and was just not up to doing anything when I got back home. This illness is physically exhausting and at times totally debilitating. I hate being sick!

Please forgive my delay in updating you, but you will have this in your inbox later this evening, I promise!

Bonnie H. Kelly, CVR
Official Court Reporter

5th Circuit - At-large

From: Ronald Paul <ronaldipaul@att.net <mailto:ronaldipaul@att.net>>
Sent: Tuesday, November 19, 2019 8:07:58 PM
To: Kelly, Bonnie
Cc: Transcripts
Subject: Re: Request For Transcript Record

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

Ms. Kelly

Request updated status on Transcript of Record, as of today November 19, 2019, I have not received the Transcript of Record.

Ronald I. Paul

On Wednesday, November 6, 2019, 4:21:04 PM EST, Kelly, Bonnie <bkelly@sccourts.org <mailto:bkelly@sccourts.org>> wrote:

Sorry if the information was confusing initially. An "e-tran" is delivery via email, in PDF format, which is what you have now requested, I believe.

You may make copies yourself, of course, as long as you do not SHARE them w/anyone other than the Court. If you share the transcript with another attorney or party, according to our rules, I am entitled to a copy rate of \$1.00 per page, plus either USPS or e-tran charge, depending on delivery method.

I received your money order in yesterday afternoon's mail for \$345.00 Accordingly, the transcript will be due within seven (7) business days. which will be 11/15/19. We have a holiday on Monday and weekends are not business days; however, I will make every effort to deliver it to you before that day.

Hope that's a bit more clear. Thank you.

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

From: Ronald Paul <ronaldipaul@att.net <mailto:ronaldipaul@att.net> <mailto:ronaldipaul@att.net <mailto:ronaldipaul@att.net>>>
Sent: Wednesday, November 6, 2019 7:19:07 AM
To: Kelly, Bonnie
Cc: Transcripts
Subject: Re: Request For Transcript Record

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

Ms. Kelly,

CHANGES: To my Request For Transcript of Record

1. I am cancelling an "original via e-tran", because I do not know what an original via e-tran is.
2. I am cancelling an "original hardcopy be mail to me".

I am ONLY requesting "an PDFcopy be email to me", this is a total of one. I am attaching an example of a PDF copy (Transcript of Record) prepared for me my circuit court reporter Ms. Elizabeth B. Harris. So my request is clearly. The advanced payment of \$345.00 was mailed on Monday morning November 4, 2019.

In addition, I agree to pay at the rate of \$1.00 per page.

If you have any questions, please call me @ 803 414-2305.

Thanking you in advance,

Mailing address

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

On Tuesday, November 5, 2019, 10:52:32 AM EST, Ronald Paul <ronaldipaul@att.net <mailto:ronaldipaul@att.net> <mailto:ronaldipaul@att.net <mailto:ronaldipaul@att.net>>> wrote:

Ms. Kelly,

I do not know what you mean when you say, "which includes an original via e-tran". Please cancel this " an original via e-tran". I am Pro Se, and do not know what an original via e-tran is, therefore:

- I am requesting "an original hardcopy be mail to me" and,
- I am requesting "an PDFcopy be email to me".


~~~ 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.

## Transcript Request Form

Pursuant to Rule 207 and 607 of the South Carolina Appellate Court Rules, the transcribed paper copy is the official record of court proceedings. You may request a transcript by completing this form and emailing it to the Court Reporter and to South Carolina Court Administration at [transcripts@sccourts.org](mailto:transcripts@sccourts.org). Click [here](#) for instructions on how to find the court reporter's email and mailing addresses. Once the court reporter receives your request, it will be processed pursuant to Rule 207 and 607 of the SCACR. Rule 607(h) governs the fees for transcripts, which are not provided for free or at reduced rates to any party. Please send by mail a money order or certified bank check to the court reporter in order to obtain the transcript. Some court reporters may accept personal checks. Please check with the court reporter to see if this option is available. Once your request is received, you will receive a copy of this form with the bottom portion completed. Please promptly submit your payment in order for the transcript to be provided. If you need to cancel the transcript request for any reason, you are responsible for paying for the pages of the transcript that have already been completed at the time of the cancellation.

| Requestor's Information                                |                                                                                                                                         |                                                                                         |                          |
|--------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------|
| <b>Full Name</b><br>Ronald I. Paul, <i>pro se</i>      | <b>Phone Number</b><br>(803) 414 - 2305                                                                                                 | <b>Email Address</b><br>ronaldipaul@att.net                                             |                          |
| <b>Mailing Address</b><br>PO Box 4353                  | <b>City</b><br>Columbia                                                                                                                 | <b>State</b><br>SC                                                                      | <b>Zip Code</b><br>29240 |
| Transcript Information                                 |                                                                                                                                         |                                                                                         |                          |
| <b>Docket Number</b><br>2018-CP-400-5641               | <b>Case Caption (i.e. State v. John Doe or Smith v. Smith)</b><br>Ronald I. Paul v. South Carolina Department of Transportation, et al. |                                                                                         |                          |
| <b>Date(s) of Proceeding</b><br>August 8, 2019         | <b>Circuit</b> <input checked="" type="checkbox"/><br><b>Family</b> <input type="checkbox"/>                                            | <b>County</b><br>Richland                                                               |                          |
| <b>Presiding Judge</b><br>Jocelyn Newman, Chief Judges |                                                                                                                                         | <b>Expedited</b> Yes <input type="checkbox"/><br>No <input checked="" type="checkbox"/> |                          |
| <b>Court Reporter(s)</b><br>Bonnie H. Kelly            |                                                                                                                                         | <b>Opposing Counsel</b> Andrew F. Lindemann and Michael H. Quinn                        |                          |

**Requestor's Signature:** Ronald I. Paul  
(Typed name will serve as signature)

**Date:** November 2, 2019

**Note:** If you are ordering a transcript pursuant to Rule 207(a)(1), SCACR, you must contemporaneously furnish all parties, the Office of Court Administration, and the clerk of the appellate court with copies of all correspondence with the court reporter.

| For Court Reporter Use Only                  |                               |                               |                                          |
|----------------------------------------------|-------------------------------|-------------------------------|------------------------------------------|
| <b>Full Name</b><br>_____                    | <b>Date Received</b><br>_____ | <b>Email Address</b><br>_____ |                                          |
| <b>Notice of Estimate to Requestor Party</b> |                               |                               |                                          |
| Date: _____                                  |                               | Number of Pages: _____        | Estimated Amount _____                   |
| <b>Mailing Address for Payment</b><br>_____  |                               | <b>City</b><br>_____          | <b>State</b> _____ <b>Zip Code</b> _____ |

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NOV 20 2019

SC Court of Appeals

**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**

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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.....**

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**DEC 20 2019**

**SC Court of Appeals**

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**PROOF OF SERVICE**

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I, Ronald I. Paul hereby certify that I have served the Appellant  
**REQUEST FOR TRANSCRIPT OF RECORD** 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, December 20, 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

December 20, 2019  
Columbia, South Carolina

RESPONDENTS COUNSEL OF RECORD

ANDREW F. LINDEMANN  
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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**