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THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appellate Case No. 2020-00203

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2017-CP-42-03523

Shannon P. Green,
and Darrell Russell,

Plaintiffs,

v.

Edward C. McGee,
and David Hudgins,

Respondents,

Of whom Shannon P. Green is the
and

Appellant/Respondent,

Of whom David Hudgins is the

Respondent/Appellant.

MOTION FOR PERMISSION TO ORDER THE TRANSCRIPT
OUTSIDE OF THE FILING DEADLINES

Pursuant to this Court's letter dated February 27, 2020, Appellant/Respondent moves that the Court grant her Attorney permission to order the transcript outside of the filing deadline. Attached as Exhibits 1 and 2 are copies of correspondence showing that all that relevant transcripts have been ordered.

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MAR 09 2020

SC Court of Appeals

Signature next page

Respectfully submitted,

CHURDAR LAW FIRM

A handwritten signature in black ink, appearing to read "Douglas A. Churdar", written over a horizontal line.

Douglas A. Churdar (SC Bar No. 11971)

304 Pettigru Street

Greenville, South Carolina 29601

Phone: 864.233.0203

Fax: 864.233.3020

Emails: dachurdar@churdarlaw.com

Attorney for Plaintiffs

March 4, 2019

Greenville, South Carolina

EXHIBIT

1

Wendy Fowler

From: Wendy Fowler on behalf of Doug Churdar
Sent: Monday, March 2, 2020 5:24 PM
To: Green, Pamela E.
Cc: Doug Churdar
Subject: Transcript of trial—Shannon Green—2017-CP-42-03523
Attachments: Transcript Request 2.28.20.pdf; Addendum- Transcript 2.28.20.pdf

Importance: High

Pam:

Per our prior conversations and emails, I am requesting a transcript of proceedings in the above-referenced case as outlined on the addendum. We have agreed that you will be paid upon receipt of the transcript.

Please contact me with any questions or comments.

Doug Churdar
Churdar Law Firm
304 Pettigru Street
Greenville, SC 29601

Office: (864) 233-0203
Cell: (864) 918-7469
Fax: (864) 233-3020

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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. 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 | | | |
|---|--|---|---------------------------------|
| Full Name <u>Douglas A. Churdar</u> | Phone Number <u>864-233-0203</u> | Email Address <u>dachurdar@churdarlaw.com</u> | |
| Mailing Address <u>304 Pettigru Street</u> | City <u>Greenville</u> | State <u>SC</u> | Zip Code <u>29601</u> |
| Transcript Information | | | |
| Docket Number <u>2017-CP-42-03523</u> | Case Caption (i.e. State v. John Doe or Smith v. Smith) <u>Shannon P. Green and Darrell Russell v. Edward C. McGee and David Hudgins</u> | | |
| Date(s) of Proceeding <u>10/14/2019 to 10/16/2019</u> | Circuit <input checked="" type="checkbox"/> Family <input type="checkbox"/> | County <u>Spartanburg</u> | |
| Presiding Judge <u>Gracie Knie</u> | Expedited Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | | |
| Court Reporter(s) <u>Pamela Green</u> | Opposing Counsel <u>Michael A. Coulter</u> <u>James A. Bradshaw</u> | | |

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MAR 09 2020
SC Court of Appeals

Requestor's Signature: Douglas A. Churdar
(Typed name will serve as signature)

Date: 2/28/2020

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 | | | |
|--|-------------------------|-------------------------|-----------------|
| Full Name | Date Received | Email Address | |
| Notice of Estimate to Requestor Party | | | |
| Date: | Number of Pages: | Estimated Amount | |
| Mailing Address for Payment | City | State | Zip Code |

ADDENDUM TO REQUEST OF TRIAL TRANSCRIPT

SHANNON GREEN & DARRELL RUSSELL

v.

EDWARD MCGEE & DAVID HUDGINS

Case No.: 2017-CP-42-03523

Date of Trial: 10/14/-10/16/2019

Post-Trial Motions 12/20/2019

- Testimony of all witnesses **only**.
 - (**No** discussion/argument outside jury presence.)
- Jury charge.
- Mr. Churdar's closing argument **only**.
- Post-trial motions held on **12/20/2019** with **Judge Knie**.

EXHIBIT

2

Wendy Fowler

From: Wendy Fowler on behalf of Doug Churdar
Sent: Wednesday, March 4, 2020 6:27 PM
To: mwatts@sccourts.org; transcripts@sccourts.org
Cc: Doug Churdar; Wendy Fowler; Drew Bradshaw; Ellen Behymer; Michael T. Coulter (mcoulter@clarksonwalsh.com); Tracy D. Brown (tbrown@clarksonwalsh.com)
Subject: Transcript of trial—Shannon Green—2017-CP-42-03523
Attachments: Transcript Request Form- Post Trial Motions (Michael Watts) 3.4.20.pdf

Mr. Watts:

I am requesting a transcript of the post-trial motions in the above-referenced case that were held on 12/20/2019 at 9:30 a.m. with Judge Knie. Payment will be forwarded to you immediately upon receipt of the transcript. All counsel of record, court reporter, and transcripts department have been copied with this request via email. Jenny Abbott Kitchings, Clerk for SC Court of Appeals and Amy Cox, Clerk for Spartanburg County being copied via US Mail only.

Please contact me with any questions or comments.

Doug Churdar
Churdar Law Firm
304 Pettigru Street
Greenville, SC 29601

Office: (864) 233-0203
Cell: (864) 918-7469
Fax: (864) 233-3020

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| Requestor's Information | | | |
|--|--|---|--|
| Full Name <u>Douglas A. Churdar</u> | Phone Number <u>864-233-0203</u> | Email Address <u>dachurdar@churdarlaw.com</u> | |
| Mailing Address <u>304 Pettigru Street</u> | City <u>Greenville</u> | State <u>SC</u> | Zip Code <u>29601</u> |
| Transcript Information | | | |
| Docket Number <u>2017-CP-42-03523</u> | Case Caption (i.e. State v. John Doe or Smith v. Smith) <u>Shannon P. Green and Darrell Russell v. Edward C. McGee and David Hudgins</u> | | |
| Date(s) of Proceeding <u>12/20/2019</u> | Circuit <input checked="" type="checkbox"/> Family <input type="checkbox"/> | County <u>Spartanburg</u> | |
| Presiding Judge <u>Gracie Knie</u> | Expedited Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> | | RECEIVED MAR 09 2020 SC Court of Appeals |
| Court Reporter(s) <u>Michael Watts</u> | Opposing Counsel <u>Michael A. Coulter</u> <u>James A. Bradshaw</u> | | |

Requestor's Signature: Douglas A. Churdar
(Typed name will serve as signature)

Date: 3/4/2020

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 | | | |
|--|----------------------|----------------------|-----------------|
| Full Name | Date Received | Email Address | |
| Notice of Estimate to Requestor Party | | | |
| Date: | Number of Pages: | Estimated Amount | |
| Mailing Address for Payment | City | State | Zip Code |

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

Appellate Case No. 2020-00203

APPEAL FROM SPARTANBURG COUNTY
Court of Common Pleas

Grace Gilchrist Knie, Circuit Court Judge

Case No. 2017-CP-42-03523

Shannon P. Green and
Darrell Russell,

Plaintiff(s),

v.

Edward C. McGee and
David Hudgins,

Respondent(s).

Of whom Shannon P. Green is

Appellant/Respondent,

And

Of whom David Hudgins is

Respondent/Appellant.

PROOF OF SERVICE

I certify that I have served the Motion for Permission to Order the Transcript Outside of Filing Deadlines on Edward C. McGee and David Hudgins by depositing a copy of it in the United States Mail, postage prepaid, and by electronic mail, on **March 5, 2020**, addressed to each of their attorney of record as follows:

Michael T. Coulter, Esquire
CLARKSON, WALSH, & COULTER, P.A.
Post Office Box 6728
Greenville, South Carolina 29606
Email: mcoulter@clarksonwalsh.com

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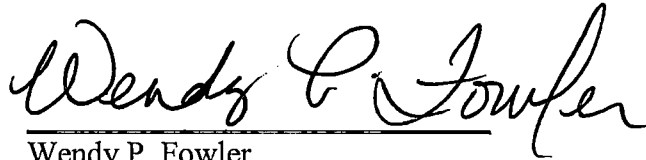
MAR 09 2020

SC Court of Appeals

James A. Bradshaw, Esquire
GALLIVAN, WHITE & BOYD, P.A.
P.O. Box 10589
Greenville, South Carolina 29603
Email: dbradshaw@gwblawfirm.com

3/5/20

Date



Wendy P. Fowler,
Paralegal to
Douglas A. Churdar



Churdar Law Firm

Douglas A. Churdar

March 5, 2020

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MAR 09 2020

SC Court of Appeals

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

RE: Shannon P. Green and Darrell Russell, Plaintiffs v. Edward C. McGee and David Hudgins, Respondents, of whom Shannon P. Green is Appellant/Respondent and of whom David Hudgins is Respondent/Appellant

Appellate Case No. 2020-00203

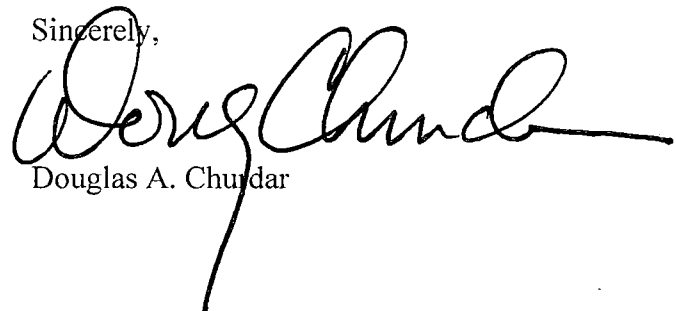
Dear Ms. Kitchings:

Enclosed for filing is a Motion for Permission to Order the Transcript Outside the Filing Deadlines in the above case, as well as the following:

- (1) Exhibit 1, Proof of Correspondence to Court Reporter for trial held on 10/14 - 10/16/19.
- (2) Exhibit 2, Proof of Correspondence to Court Reporter for post-trial motions held on 12/20/19.
- (3) Certificate of Service of motion on all parties/counsel of record;
- (4) A filing fee of \$50.00.
- (5) A self-addressed stamped envelope for a stamped copy of the motion to be returned for my records.

Thank you very much.

Sincerely,



Douglas A. Churdar

DAC/wpf

Enclosure(s)

cc: Michael T. Coulter (via US Mail & email)
James A. Bradshaw (via US Mail & email)
Clerk of Court-Spartanburg (US Mail only)
Clerk of Court, -SC Court of Appeals (US Mail only)
South Carolina Court Admin (via email @transcripts@sccourts.org)

