

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

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Apr 27 2020

SC Court of Appeals

APPEAL FROM RICHLAND COUNTY
Court of Common Pleas

The Honorable Robert E. Hood, Circuit Court Judge

Appellate Case No. 2020-000581

Harland Jones,Appellant

v.

Karen Robinson,Respondent.

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

Harland Jones (“Appellant”) respectfully requests that this Court grant Appellant leave to order the December 5, 2019 transcript for the hearing on Plaintiff’s Motion to Reconsider outside of the deadline specified in Rule 207. As shown below, and attached hereto as Exhibit A and Exhibit B, Appellant ordered the transcript on April 24, 2020 and the court reporter acknowledged receipt of the same.

{Signature on following page}

April 24, 2020

s/Lane D. Jefferies
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
Gus A. Anastopoulos
SC Bar No.: 103713
Anastopoulos Law Firm, LLC
32 Ann Street
Charleston, South Carolina 29403
(843) 614-8888
Attorneys for Appellant

Counsel of Record for Respondent:

Brett H. Bayne, Esquire
SC Bar No.: 100018
Sterling G. Davies, Esquire
SC Bar No.: 5840
Michael M. Trask, Esquire
SC Bar No.: 103120
McAngus, Goudelock & Courie, LLC
P.O. Box 12519
1320 Main Street, 10th Floor (29201)
Columbia, SC 29211
(803) 779-2300
Attorneys for Karen Robinson

Rogers E. Harrell, III, Esquire
SC Bar No.: 101532
Murphy & Grantland, PA
P.O. Box 6648
Columbia, SC 29260
(803) 782-4100 ex: 1241
Attorney Progressive Insurance Company

EXHIBIT A

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>Allison MacPherson</u> | Phone Number <u>843-614-8888</u> | Email Address <u>allison@akimlawfirm.com</u> | |
| Mailing Address <u>32 Ann Street</u> | City <u>Charleston</u> | State <u>SC</u> | Zip Code <u>29403</u> |
| Transcript Information | | | |
| Docket Number <u>2018CP4001518</u> | Case Caption (i.e. State v. John Doe or Smith v. Smith) <u>Harland Jones v. Karen Robinson</u> | | |
| Date(s) of Proceeding <u>December 5, 2019</u> | Circuit <input checked="" type="checkbox"/> Family <input type="checkbox"/> | County <u>Richland</u> | RECEIVED Apr 27 2020 |
| Presiding Judge <u>Judge Robert Hood</u> | Expedited Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | | |
| Court Reporter(s) <u>Aileen Butler</u> <u>abutler@sccourts.org</u> | Opposing Counsel Brett Bayne- McAngus Goudelock & Courie, LLC J. Andrew Delaney- McAngus Goudelock & Courie, LLC Rogers Edward Harrell- Murphy Grantland, P.A. | | |

Requestor's Signature: Allison MacPherson
(Typed name will serve as signature)

Date: 4/24/2020

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 _____ |

EXHIBIT B



Allison MacPherson <allison@akimlawfirm.com>

Request for Transcript, Case No.: 2018CP4001518 - Harland Jones v. Karen Robinson

2 messages

Allison MacPherson <allison@akimlawfirm.com>

Fri, Apr 24, 2020 at 2:37 PM

To: abutler@sccourts.org, Transcripts <transcripts@sccourts.org>

Cc: TeamJefferies <teamjefferies@googlegroups.com>, brett.bayne@mgclaw.com, michael.trask@mgclaw.com, Sterling Davies <sdavies@mgclaw.com>, rharrell@murphygrantland.com

Dear Ms. Butler,

I hope you are staying healthy and well. Please see the attached transcript request form for the hearing held on December 5, 2019. Should you have any questions, please do not hesitate to contact us.

Thank you in advance!

Best Regards,
Allison

--

Allison MacPherson
Paralegal
Commercial and Construction Liability Division**Anastopoulos Law Firm LLC**

32 Ann Street | Charleston, SC 29403

Tel: 843-614-8888 | Fax: 843-494-5536

www.akimlawfirm.com | allison@akimlawfirm.com

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 **12.5.2019 Transcript Request Form.docx**
22K**Butler, Aileen** <abutler@sccourts.org>

Fri, Apr 24, 2020 at 8:19 PM

To: Allison MacPherson <allison@akimlawfirm.com>, Transcripts <transcripts@sccourts.org>

Cc: TeamJefferies <teamjefferies@googlegroups.com>, "brett.bayne@mgclaw.com" <brett.bayne@mgclaw.com>, "michael.trask@mgclaw.com" <michael.trask@mgclaw.com>, Sterling Davies <sdavies@mgclaw.com>, "rharrell@murphygrantland.com" <rharrell@murphygrantland.com>

Dear Ms. MacPherson,

I would be happy to prepare the transcript. I see you would like it on a rush basis. I would need payment before I produce the transcript of \$405. That's an estimate. If it turns out to be less of course I will refund the amount and likewise if it's more you will be responsible. You can send payment to 1642 Old Tara Lane, Fort Mill, SC 29708.

Have a pleasant weekend.

Aileen Butler

From: Allison MacPherson <allison@akimlawfirm.com>
Sent: Friday, April 24, 2020 2:37 PM
To: Butler, Aileen; Transcripts
Cc: TeamJefferies; brett.bayne@mgclaw.com; michael.trask@mgclaw.com; Sterling Davies;
rharrell@murphygrantland.com
Subject: Request for Transcript, Case No.: 2018CP4001518 - Harland Jones v. Karen Robinson

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

Dear Ms. Butler,

I hope you are staying healthy and well. Please see the attached transcript request form for the hearing held on December 5, 2019. Should you have any questions, please do not hesitate to contact us.

Thank you in advance!

Best Regards,
Allison

--

Allison MacPherson

Paralegal

Commercial and Construction Liability Division

Anastopoulo Law Firm LLC

32 Ann Street | Charleston, SC 29403

Tel: 843-614-8888 | Fax: 843-494-5536

www.akimlawfirm.com<[https://urldefense.com/v3/__http://www.akimlawfirm.com__;!!JHVHxrUang!FpXZsys7jU7GNWVSiGOkK8zrOGe1NwpwVYShxGiJI-GoiEZPFT5oHk69gBI6cAA9\\$](https://urldefense.com/v3/__http://www.akimlawfirm.com__;!!JHVHxrUang!FpXZsys7jU7GNWVSiGOkK8zrOGe1NwpwVYShxGiJI-GoiEZPFT5oHk69gBI6cAA9$)> | allison@akimlawfirm.com<<mailto:allison@akimlawfirm.com>>

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By Appointment Only: Wilmington, NC

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Harland Jones, .....Appellant

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Karen Robinson, .....Respondent.

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

I hereby certify that Appellant’s Motion for Leave to order a transcript outside of the deadline, pursuant to Rule 207, was served on Respondents by U.S. Mail Postage Prepaid addressed to Respondents’ attorneys of record, Brett H. Bayne, Sterling G. Davies, Michael M. Trask, and Rogers E. Harrell, III.

{Signature on following page}

April 24, 2020

s/Lane D. Jefferies  
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  
Gus A. Anastopoulo  
SC Bar No.: 103713  
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(843) 614-8888  
***Attorneys for Appellant***

Counsel of Record for Respondent:

Brett H. Bayne, Esquire  
SC Bar No.: 100018  
Sterling G. Davies, Esquire  
SC Bar No.: 5840  
Michael M. Trask, Esquire  
SC Bar No.: 103120  
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***Attorneys for Karen Robinson***

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REPLY TO ANN STREET OFFICE

# ANASTOPOULO

---

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

\*OF COUNSEL

April 24, 2020

**Sent Via U.S. Mail**

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

RE: *Harland Jones v. Karen Robinson*  
Case No.: 2018-CP-40-01518  
Appellate Case No.: 2020-000581

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**SC Court of Appeals**

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. A check in the amount of \$50.00 for the filing fee will be submitted within five (5) days.

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

Sincerely,

*s/Lane D. Jefferies*

Lane D. Jefferies, Esq.

Enclosures as stated

cc: Brett H. Bayne, Esquire  
Sterling G. Davies, Esquire  
Michael M. Trask, Esquire  
Rogers E. Harrell, III, Esquire  
South Carolina Court Administration

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