

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

APPEAL FROM RICHLAND COUNTY  
Court of Common Pleas

The Honorable Robert E. Hood, Circuit Court Judge

Appellate Case No. 2020-000581

**RECEIVED**

MAY 04 2020

SC Court of Appeals

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 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. Anastopoulo

SC Bar No.: 103713

Anastopoulo 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

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*Attorneys for Karen Robinson*

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SC Bar No.: 101532

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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](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> <u>Allison MacPherson</u>	<b>Phone Number</b> <u>843-614-8888</u>	<b>Email Address</b> <u>allison@akimlawfirm.com</u>	
<b>Mailing Address</b> <u>32 Ann Street</u>	<b>City</b> <u>Charleston</u>	<b>State</b> <u>SC</u>	<b>Zip Code</b> <u>29403</u>
Transcript Information			
<b>Docket Number</b> <u>2018CP4001518</u>	<b>Case Caption</b> (i.e. State v. John Doe or Smith v. Smith) <u>Harland Jones v. Karen Robinson</u>		
<b>Date(s) of Proceeding</b> <u>December 5, 2019</u>	<b>Circuit</b> <input checked="" type="checkbox"/> <b>Family</b> <input type="checkbox"/>	<b>County</b> <u>Richland</u>	<b>RECEIVED</b>  <b>MAY 04 2020</b>
<b>Presiding Judge</b> <u>Judge Robert Hood</u>	<b>Expedited</b> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
<b>Court Reporter(s)</b> <u>Aileen Butler</u>  <u>abutler@sccourts.org</u>	<b>Opposing Counsel</b> <u>Brett Bayne- McAngus Goudelock &amp; Courie LLC</u> <u>J. Andrew Delaney- McAngus Goudelock &amp; Courie, LLC</u> <u>Rogers Edward Harrell- Murphy Grantland, P.A.</u>		

**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			
<b>Full Name</b> _____	<b>Date Received</b> _____	<b>Email Address</b> _____	
<b>Notice of Estimate to Requestor Party</b> Date: _____ Number of Pages: _____ Estimated Amount _____			
<b>Mailing Address for Payment</b> _____	<b>City</b> _____	<b>State</b> _____	<b>Zip Code</b> _____

# **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  
Office Locations: Charleston | N. Charleston | Florence | Columbia | Greenville | Myrtle Beach | Raleigh, NC  
By Appointment Only: Wilmington, NC

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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](http://www.akimlawfirm.com)<[https://urldefense.com/v3/\\_\\_http://www.akimlawfirm.com\\_\\_;!!JHVHxrUang!FpXZsys7jU7GNWWSiGOkK8zrOGe1NwppwVYShxGiJl-GoiEZPFT5oHk69gBI6cAA9\\$>](https://urldefense.com/v3/__http://www.akimlawfirm.com__;!!JHVHxrUang!FpXZsys7jU7GNWWSiGOkK8zrOGe1NwppwVYShxGiJl-GoiEZPFT5oHk69gBI6cAA9$>) | [allison@akimlawfirm.com](mailto:allison@akimlawfirm.com)<<mailto:allison@akimlawfirm.com>>

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By Appointment Only: Wilmington, NC

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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

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***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

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***Attorneys for Karen Robinson***

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SC Bar No.: 101532

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FACSIMILE: (843) 494-5536

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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**Columbia:** 1201 Main Street, Suite 1100, Columbia, South Carolina 29201 \* **Raleigh, NC:** 8801 Fast Park Drive, Suite 301, Raleigh, NC 27617

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Charleston, SC 29403

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**SC Court of Appeals**

The Honorable Jenny Abbott Kitchings  
Clerk of SC Court of Appeals  
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Columbia, SC 29211



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