

Ronald I. Paul
P.O. Box 4353 Columbia, South Carolina 29240
ronaldipaul@att.net
(803) 414-2305

July 31, 2020

HAND DELIVERY

The Honorable Jenny Abbott Kitchings
Clerk of Court, South Carolina Court of Appeals
1220 Senate St.
Columbia, SC 29201

RECEIVED
JUL 31 2020
SC Court of Appeals

Re: Ronald I. Paul v. SCDOT, et al
Court of Appeals Case No: 2019-002076
Civil Action Case Number: 2018-CP-400-5641

Dear Ms. Kitchings:

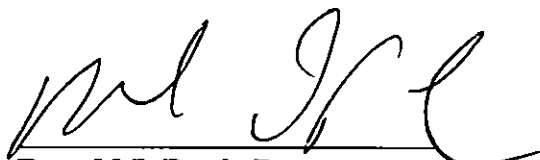
In response to the Court's letter dated July 30, 2020, please allow this letter to serve as notice that, as of today's date, I have not yet received a copy of the transcript of record or any information indicating that any extension have been or was granted to court reporter, Bonnie H. Kelly.

I have been in contact with Desiree Allen at the South Carolina Office of Court Administration on March 20, 2020 and again on June 4, 2020. I have attached a copy of her (Ms. Allen) responses (to this letter (exhibit A)). In addition, I have attached a copy of Mr. Lindemann response, to Ms. Allen, to this letter (exhibit B).

Today I will be sending Ms. Allen at the South Carolina Office of Court Administration an email request, for an updated status on the transcript of record, and advise the Court of the current status of the transcript.

By copy of this letter I am serving copies on South Carolina Office of Court Administration, and other parties or other parties counsel of record as listed on page two.

Very sincerely yours,



Ronald I. Paul, *Pro se*
Appellant

CC

South Carolina Office of Court Administration
Attn: Desiree Allen
1220 Senate Street, Suite 201
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
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

EXHIBIT

A

RE: Notice: under Rule 207 a(5) SCACR Failure to Receive Transcript.

ronaldipaul@att_/SCDOT vs Paul



Allen, Desiree <dallen@sccourts.org>
 To: Ronald Paul <ronaldipaul@att.net>
 Cc: Andrew Lindemann <andrew@ldh-law.com>, Mike Quinn <mquinn@quinnlawfirmllc.com>, chuck@ormondunn.com <chuck@ormondunn.com>

Jul 10 at 8:17 AM

Mr. Paul, I apologize for asking again. I just want to be clear since Ms. Kelly appears to be communicating with other transcript requesters while we continue to try to track outstanding transcripts. Thank you.

From: Ronald Paul <ronaldipaul@att.net>
Sent: Thursday, July 9, 2020 4:43 PM
To: Allen, Desiree <DAllen@sccourts.org>
Cc: Andrew Lindemann <andrew@ldh-law.com>; Mike Quinn <mquinn@quinnlawfirmllc.com>; chuck@ormondunn.com
Subject: Re: Notice: under Rule 207 a(5) SCACR Failure to Receive Transcript.

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

Ms. Desiree,

As of today's, date July 9, 2020 @ 4:08pm, I confirm, that I have not received the transcript of record or an extension to deliver same as previously stated in my letter to the Honorable Jenny Abbott Kitchings, Clerk of Court, South Carolina Court of Appeals, filed on June 8, 2020.

The last time Ms. Kelly contacted me was on November 22, 2019, @ 2:01 pm by email, see attached email traffic (please read all pages).

And at all times, an anytime Ms. Kelly contacted me is within this attached email traffic (please read all pages).

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

Ronald I. Paul
 Pro Se

On Thursday, July 9, 2020, 08:23:56 AM EDT, Allen, Desiree <dallen@sccourts.org> wrote:

Good morning, Mr. Paul. I am writing to ask if you will please confirm that you have not received the transcript or been contacted by Ms. Kelly as of this date.

From: Ronald Paul <ronaldipaul@att.net>
Sent: Tuesday, June 23, 2020 8:00 AM
To: Allen, Desiree <DAllen@sccourts.org>
Cc: Transcripts <transcripts@sccourts.org>; Andrew Lindemann <andrew@ldh-law.com>; Mike Quinn <mquinn@quinnlawfirmllc.com>; chuck@ormondunn.com
Subject: Re: Notice: under Rule 207 a(5) SCACR Failure to Receive Transcript.

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

As of today's, date, I have not received the transcript of record as previously stated in my letter to the Honorable Jenny Abbott Kitchings, Clerk of Court, South Carolina Court of Appeals, filed on June 8, 2020.

My understanding of your below email is that the said transcript is lost or have been destroyed, in other words there is no tape, backup tape nothing to transcribe the record in said case.

If so, please prepare / write a letter to me to that effect.

I do not know whether Mr. Andrew F. Lindemann, Mr. Michael H. Quinn or Mr. J. Charles Ormand received a copy of a transcribed record in said case.

Thanking you in advance,

Ronald I. Paul
 Appellant
 Pro Se

On Monday, June 22, 2020, 10:18:56 AM EDT, Allen, Desiree <dallen@sccourts.org> wrote:

Good morning, Mr. Paul. I hope you are well. I have another court reporter helping me to locate records to assist with preparing outstanding transcript requests from the records Ms. Kelly delivered to this office. We can see that there was email correspondence between the two of you and a promise to deliver the transcript to you.

Unfortunately, we are unable to find a copy of said transcript in her records. I am prepared to write a letter to you to that effect if you're certain it has not been received. I have copied the others you copied in case one of them has received the transcript from Ms. Kelly. Please advise.

From: Ronald Paul <ronaldjpaul@att.net>
Sent: Tuesday, June 9, 2020 6:03 AM
To: bkelly@sccourts.org
Cc: Transcripts <transcripts@sccourts.org>; Allen, Desiree <DAllen@sccourts.org>; Andrew Lindemann <andrew@ldh-law.com>; Mike Quinn <mquinn@quinnlawfirmllc.com>; chuck@ormondunn.com; chuck@ormondunn.com
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All,
Notice: under Rule 207 a(5) SCACR Failure to Receive Transcript.

Ronald I. Paul
Pro Se

— Forwarded Message —

From: Ronald Paul <ronaldjpaul@att.net>
To: Allen Desiree <dallen@sccourts.org>
Cc: Andrew Lindemann <andrew@ldh-law.com>; Mike Quinn <mquinn@quinnlawfirmllc.com>; "chuck@ormondunn.com" <chuck@ormondunn.com>; "chuck@ormondunn.com" <chuck@ormondunn.com>
Sent: Monday, June 8, 2020, 12:03:38 PM EDT
Subject: Updated status on transcript, as of June 8, 2020.

All:

Please find attached a copy of a letter and email traffic to Honorable Jenny Abbott Kitchings, Clerk of Court, South Carolina Court of Appeals, filed today, June 8, 2020.

Ronald I. Paul
Pro Se

— 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.

EXHIBIT

B

RE: Notice: under Rule 207 a(5) SCACR Failure to Receive Transcript.

ronaldipaul@att.net/SCDOT vs Paul



Andrew Lindemann <andrew@ldh-law.com>
 To: Allen, Desiree <dallen@sccourts.org>, Ronald Paul <ronaldipaul@att.net>
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Jun 24 at 12:19 PM

Ms. Allen:

On behalf of all of the Defendants (including Mr. Quinn and Mr. Ormond), I submitted a Transcript Request Form to Ms. Kelly for the motion hearing held on August 8, 2019, but I have not received the transcript at this time.

If you need a copy of the Transcript Request Form, let me know. A copy was previously sent to Court Administration.

I hope this information is helpful.

Andrew Lindemann

From: Allen, Desiree <DAllen@sccourts.org>
Sent: Monday, June 22, 2020 10:19 AM
To: Ronald Paul <ronaldipaul@att.net>
Cc: Transcripts <transcripts@sccourts.org>; Andrew Lindemann <Andrew@LDH-Law.com>; Mike Quinn <mquinn@quinnlawfirmllc.com>; chuck@ormondunn.com; chuck@ormondunn.com
Subject: RE: Notice: under Rule 207 a(5) SCACR Failure to Receive Transcript.

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To: bkelly@sccourts.org
Cc: Transcripts <transcripts@sccourts.org>; Allen, Desiree <DAllen@sccourts.org>; Andrew Lindemann <andrew@ldh-law.com>; Mike Quinn <mquinn@quinnlawfirmllc.com>; chuck@ormondunn.com; chuck@ormondunn.com
Subject: Notice: under Rule 207 a(5) SCACR Failure to Receive Transcript.

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All,
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Ronald I. Paul
 Pro Se

----- Forwarded Message -----

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To: Allen Desiree <dallen@sccourts.org>
Cc: Andrew Lindemann <andrew@ldh-law.com>; Mike Quinn <mquinn@quinnlawfirmllc.com>; "chuck@ormondunn.com" <chuck@ormondunn.com>; "chuck@ormondunn.com" <chuck@ormondunn.com>
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Ronald I. Paul
 Pro Se

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RONALD I. PAUL
POST OFFICE BOX 4353
COLUMBIA SC 29240

RECEIVED
JUL 31 2020
SC Court of Appeals

South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS, CLERK
POST OFFICE BOX 11629
COLUMBIA, SOUTH CAROLINA 29211