

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Court of Common Pleas
Case No. 2016-CP-07-1493
Marvin H. Dukes III, Master in Equity

Appellate Case No. 2020-001148

Juan Antonio Adame Tapia
and Oscar Moreno,

Appellants,

v.

, Maria Walls, in her capacity
as Treasurer for Beaufort
County, Berkeley Hall Club,
Inc., Colleton River Plantation
Club, Inc., Callawassie Island
Property Owners Association,
Inc., Belfair Property Owners
Association, Inc., David
LaPorte, Karen B. Lester,
Timothy B. Hockman, Sheila
F. Hockman, Bill H.
Holshouser, Terry M. Ash,
Patricia Ash, and Corey T.
Brewer,

Defendants

Of whom Maria Walls, in her
capacity as Treasurer for
Beaufort County is

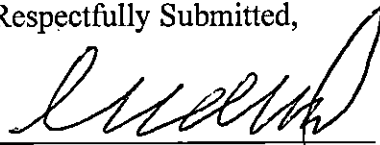
Respondent

MOTION TO FILE AND SERVE OUT OF TIME

Appellants Juan Antonio Adame Tapia and Oscar Moreno, through their undersigned counsel, move the Honorable Court for an Order permitting the ordering the Circuit Court transcript in this matter outside of the filing deadlines set by Rule 207 of the Rules of Appellate Procedure. After receiving notice of deficiency from the Court of Appeals, counsel has initiated the process of contacting the Court Reporter to order the transcript, for the hearing held June 13 by webvideo format. Counsel will be ordering the transcript as soon as the Reporter responds and further proof of said event will be filed with the Court as set forth in the Rules of Appellate Procedure.

September 2, 2020

Respectfully Submitted,



Michael W. Mogil #11933
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September 2, 2020

The Honorable Jenny Abbott Kitchings
Clerk of Court
The South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

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SC Court of Appeals

Re: Adame et al v. County of Beaufort et al, Appellate Case No. 2020-001148

Dear Ms. Kitchings,

Responding to the notices received from the Court in this matter, enclosed for filing in the above-referenced matter, please find:

- a) Motion to File (Proof of Ordering Transcript) out of Time;
- b) Proof of Service of said Motion on Respondent's Counsel; and
- c) Proof of Service of Notice of Appeal on the Clerk of Court for Beaufort County.

Thank you for your attention in this matter.

Very Truly Yours,

MOGIL LAW FIRM


Michael W. Mogil

Cc: Honorable Marvin H. Dukes III
Mary Bass Lohr, Esq.

PROOF OF SERVICE

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Of whom Maria Walls, in her
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Respondent

PROOF OF SERVICE

I certify that I have served the Motion to File and Serve Out of Time for ordering the Circuit Court transcript in this matter to Respondent, in care of counsel Mary Bass Lohr, Esq. t by depositing a copy of said document in the United States Mail, postage prepaid, on September 2, 2020 addressed to

Mary Bass Lohr, Esq.
Howell Gibson and Huges
PO Box 40
Beaufort, SC 29901

September 2, 2020



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CHARLESTON SC 294

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Clerk of Court
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29201-374905

