

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM FLORENCE COUNTY
Court of Common Pleas

The Honorable R. Kirk Griffin, Circuit Court Judge

Case No. 2020-CP-21-00565
Appellate Case No. 2020-001526

RECEIVED

Dec 22 2020

SC Court of Appeals

Cathryn Hilty,

Appellant,

v.

Shriji Hari LLC; Travelodge
Hotels, Inc.; and Wyndham
Hotels & Resorts, Inc.,

Defendants,

Of whom Palmetto Hospitality
LLC,

Respondent.

MOTION FOR EXTENSION OF TIME TO ORDER TRANSCRIPT OUTSIDE OF THE
FILING DEADLINES SET BY RULE 207 OF THE SOUTH CAROLINA APPELLATE
COURT RULES

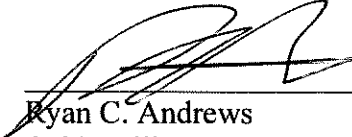
Counsel for Appellant respectfully requests permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rule in this case. In support of this request, counsel shows:

1. Counsel for Appellant respectfully submits that extraordinary circumstances exist which warrant the granting of permission to order the transcript outside of the filing deadlines, including but not limited to counsel's heavy work-load.

2. Counsel has already requested the transcript in question and is filing proof of such request contemporaneously with this motion.
3. Respondent has graciously consented to this motion as indicated by the e-mail correspondence attached hereto as Exhibit A.
4. Counsel makes this request in good faith and not for purpose of delay.

WHEREFORE, the undersigned counsel would respectfully request permission to order the transcript outside of the filing deadlines set by Rule 207 of the South Carolina Appellate Court Rules in this case based upon the above exigent circumstances.

Respectfully submitted,



Ryan C. Andrews
Cobb, Dill & Hammett, LLC
222 W. Coleman Blvd.
Mt. Pleasant, SC 29464
(843) 936-6680 (p)
(843) 279-3177 (f)
randrews@cdhlawfirm.com

Attorney for Appellant

December 22, 2020

Re: Hilty v. Palmetto Hospitality LLC

Boone Aiken <jba@aikenbridges.com>

Mon 12/21/2020 4:47 PM

To: Ryan C. Andrews <r.andrews@cdhlawfirm.com>

Cc: Alicia Arnold <ana@aikenbridges.com>

[THIS MESSAGE IS FROM AN EXTERNAL SOURCE]

Absolutely Ryan. Good Luck. Boone

Sent from my iPad

On Dec 21, 2020, at 4:24 PM, Ryan C. Andrews <r.andrews@cdhlawfirm.com> wrote:

Boone,

I hope you are well. As discussed last week, I indicated I would need to file a motion for permission to order the transcript from the lower court proceedings outside of the time permitted by the Appellate Court Rules. Accordingly, please see attached. I believe you said over the phone you would consent to the same, but wanted to send this to you first before sending to the court. Would you consent to this motion?

Thank you in advance for your consideration and I look forward to continuing to work with you.

Ryan C. Andrews

Partner/Attorney

Cobb Dill & Hammett, LLC

p: 843.936.6680

f: 843.279.3177

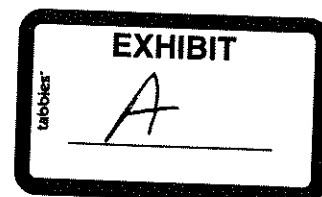
a: 222 W Coleman Blvd.

Mount Pleasant, SC 29464

w www.cdhlawfirm.com e: r.andrews@cdhlawfirm.com**DISCLAIMER:**

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Any views or opinions presented are solely those of the author and do not necessarily represent those of the firm.



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Defendants,

Of whom Palmetto Hospitality
LLC,

Respondent.

PROOF OF SERVICE

I certify that I have served the Motion for Extension of Time to Order Transcript Outside of the Filing Deadlines Set by Rule 207 of the South Carolina Appellate Court Rules on Respondent Palmetto Hospitality LLC and Defendants by depositing a copy of it in the United States Mail, postage prepaid, on December 22, 2020, and by email on December 22, 2020, addressed set forth below:

J. Boone Aiken, III
Aiken Bridges Elliott Tyler & Saleeby, P.A.
PO Drawer 1931
Florence, SC 29503
(843) 669-8787
jba@aikenbridges.com

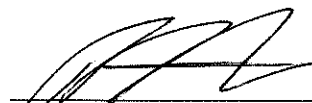
Attorney for Respondent Palmetto Hospitality LLC; and Defendants Travelodge Hotels, Inc.; and Wyndham Hotels & Resorts, Inc.

Daniel R. Settana, Jr.
Brian Lincoln Craven
Julius Carnes Nicholson, III
The McKay Firm PA
PO Box 7217
Columbia, SC 29202
(803) 256-4645
dsettana@mckayfirm.com
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jnicholson@collinsandlacy.com

Attorneys for Defendant Shriji Hari LLC

December 22, 2020

COBB DILL & HAMMETT, LLC



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randrews@cdhlawfirm.com

Attorney for Appellant

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Dec 22 2020

SC Court of Appeals

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 Ryan C. Andrews		Phone Number 843-936-6680	Email Address randrews@cdhlawfirm.com
Mailing Address Cobb Dill & Hammett, LLC, 222 W. Coleman Blvd.		City Mt. Pleasant	State SC Zip Code 29464
Transcript Information			
Docket Number 2020-CP-21-00565		Case Caption (i.e. State v. John Doe or Smith v. Smith) Cathryn Hilty v. Palmetto Hospitality et al.	
Date(s) of Proceeding September 16, 2020		Circuit <input checked="" type="checkbox"/> Family <input type="checkbox"/>	County Florence
Presiding Judge R. Kirk Griffin		Expedited Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Court Reporter(s) Keshia Reed		Opposing Counsel J. Boone Aiken, III Brian L. Craven	

Requestor's Signature: Ryan C. Andrews
(Typed name will serve as signature)

Date: 12/21/2020

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 _____

Ryan C. Andrews, Partner (SC)
Daiton R. Butler, Associate (SC)
Hal E. Cobb, Senior Partner (SC/CO)
Logan S. Davis, Associate (SC)
Michael H. Dill, Partner (SC)

Frank H. Eberling IV, Associate (SC)
William S. Hammett III, Partner (SC/GA)
Stefanie L. Huffer, Associate (SC)
Victoria L. Hurse, Associate (SC)
Bryan A. Raymond, Partner (SC)

Stephanie M. Richards, Associate (SC)
Sean A. Scapellato, Partner (SC)
David F. Shymansky Jr., Associate (SC/MD)
Jeffrey A. Slocum Jr., Associate (SC)

December 22, 2020

SENT VIA FIRST CLASS MAIL AND EMAIL TO CTAPPFILINGS@SCCOURTS.ORG

Honorable Jenny A. Kitchings
Clerk, South Carolina Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED

Dec 22 2020

Re: *Cathryn Hilty v. Palmetto Hospitality LLC et al.*
Appellate Case No. 2020-001526

SC Court of Appeals

Dear Ms. Kitchings:

I hope you are well. Enclosed for filing are the original and one copy of Appellant's Request for Transcript, Motion for Extension of Time to Order Transcript Outside of the Filing Deadlines Set by Rule 207 of the South Carolina Appellate Court Rules, and Proof of Service for the Same. The filing fee of \$50.00 is also enclosed.

Please return a clocked copies in the enclosed envelope. Thank you very much and should you have any questions concerning the matter, please do not hesitate to contact me.

Sincerely,



Ryan C. Andrews
Enclosures

Cc: J. Boone Aiken, III, Esq. (w/ enclosures)
Daniel R. Settana, Jr., Esq. (w/ enclosures)
Brian Lincoln Craven, Esq. (w/ enclosures)
Julius Carnes Nicholson, III, Esq. (w/ enclosures)

Transcript Request, Hilty v. Palmetto Hospitality et al., Case 2020-CP-21-00565Ryan C. Andrews <randrews@cdhlawfirm.com>

Mon 12/21/2020 4:31 PM

To: transcripts@sccourts.org <transcripts@sccourts.org>; Reed, Keshia T. <KReed@sccourts.org>

1 attachments (22 KB)

Transcript Request Form - Hilty v. Palmetto et al. 12-21-2020.docx;

Ms. Reed,

I hope you are well. Attached please find a transcript for the above-referenced case. Should you need anything further, please do not hesitate to contact my office. Thank you in advance for your attention to this matter.

**Ryan C. Andrews**

Partner/Attorney

Cobb Dill & Hammett, LLC

p: 843.936.6680

f: 843.279.3177

a: 222 W Coleman Blvd.

Mount Pleasant, SC 29464

w www.cdhlawfirm.com e: randrews@cdhlawfirm.com**DISCLAIMER:**

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