

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

RECEIVED

Feb 26 2021

APPEAL FROM CHARLESTON COUNTY
Court of Common Pleas

SC Court of Appeals

Bentley D. Price, Circuit Court Judge

CASE NO: 2019-CP-10-06058

Bay Light, LLC,.....Respondent
v.
Westgate Office Park Landowners' Maintenance Association Inc.....Appellant

MOTION FOR LATE FILING OF CORRESPONDENCE REQUESTING TRANSCRIPTS

Westgate Office Park Landowners' Maintenance Association Inc, moves before this honorable court for an Extension of Time to order the transcript under Rule 207(a)(1).

On February 17, 2021, the Court Administration notified counsel of record the expiration of the ten (10) day period to submit confirmation the transcripts were timely ordered. Appellant has requested copies of the transcripts from three (3) hearings and each court reporter has provide payment terms (Exh. A and Exh. B).

Counsel acknowledges that compliance with the rules is necessary for the orderly administration of appeal and it is incumbent that counsel provides the required materials to comply with the appellate review process. Henning v. Kaye, 307 S.C. 436, 415 S.E.2d 794 (1992).

The Appellant requests permission to submit copies of its correspondences requesting transcripts.



Erika V. Harrison
SC BAR No. 73024
92 Line St.
Charleston, SC 29403
843.302.1900
Attorney for Appellant

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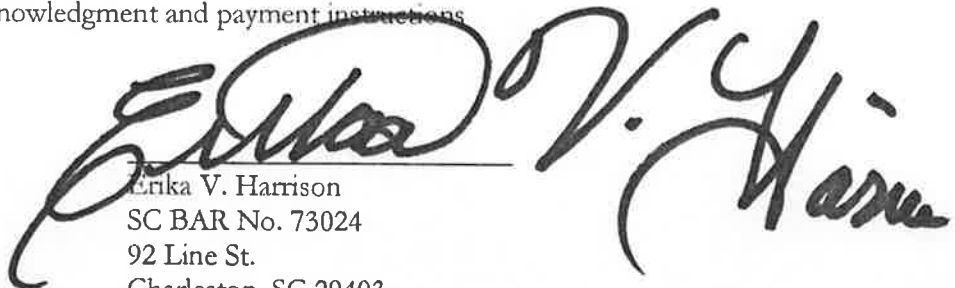
v.

Westgate Office Park Landowners' Maintenance Association Inc.....Appellant

APPELLANT'S EXHIBITS
MOTION FOR LATE FILING OF CORRESPONDENCES REQUESTING TRANSCRIPTS

- A Appellant's Letter to Court Reporters
- B Court Reporters' acknowledgment and payment instructions

February 26, 2021



Erika V. Harrison
SC BAR No. 73024
92 Line St.
Charleston, SC 29403
843.302.1900

Attorney for Appellant



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ERIKA V. HARRISON

PERSISTENCE • PERSEVERANCE • PERSONAL SERVICE

92 LINE STREET | CHARLESTON | SOUTH CAROLINA | 29403
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VIA Email [knccarney@sccourts.org]

Ms. Krista Nicole Carney
1453 Amanda Park Lane
Charleston, SC 29412

February 24, 2021

Re: Bay Light, LLC v. Westgate Office Park Landowner's Maintenance Association, Inc.
Charleston County C/A No.: 2019 -CP-10-6058
Appellate Case No: 2021-000100
Client: *Appellant*, Westgate Office Park Landowner's Maintenance Association, Inc.

Dear Ms. Carney,

Recently, I filed Notice of Appeal on behalf of the Appellant. The trial roster indicates you were the court reporter for the December 14, 2020 hearing before Judge Bentley Price; if you were not the court reporter please let me know, as well.

I am, requesting a copy of the hearing's transcript. Please let me know the cost to prepare and deliver the transcript and your payment preference.

Please feel free to email me at erika@erikaharrison.com or call my office or my mobile, 843.819.2527 to discuss any concerns you may have about its preparation.

With kindest regards,

Yours truly,

A handwritten signature in cursive script that reads 'Erika V. Harrison'.

Erika V. Harrison

EVH:evh
cc: Co-Owners of Westgate Horizontal Property Regime



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VIA Email [pnorton@sccourts.org]
Phyllis H. Norton
2083 Middleburg Lane
Mt. Pleasant, SC 29464

February 24, 2021

Re: Bay Light, LLC v. Westgate Office Park Landowner's Maintenance Association, Inc.
Charleston County C/A No.: 2019 -CP-10-6058
Appellate Case No: 2021-000100
Client: *Appellant*, Westgate Office Park Landowner's Maintenance Association, Inc.

Dear Ms. Norton,

Recently, I filed Notice of Appeal on behalf of the Appellant. The trial roster indicates you were the court reporter for the June 15, 2020 hearing before Judge Bentley Price; if you were not the court reporter please let me know, as well.

I am, requesting a copy of the hearing's transcript. Please let me know the cost to prepare and deliver the transcript and your payment preference.

Please feel free to email me at erika@erikaharrison.com or call my office or my mobile, 843.819.2527 to discuss any concerns you may have about its preparation.

With kindest regards,

Yours truly,

A handwritten signature in black ink that reads "Erika V. Harrison".

Erika V. Harrison

EVH:evh
cc: Co-Owners of Westgate Horizontal Property Regime



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T | 843.302.1900 E | ERIKA@ERIKAHARRISON.COM

VIA Email [jrueger@sccourts.org]

Joyce C. Rueger

P.O. Box 1472

Johns Island, SC 29457

February 24, 2021

Re: Bay Light, LLC v. Westgate Office Park Landowner's Maintenance Association, Inc.
Charleston County C/A No.: 2019 -CP-10-6058
Appellate Case No: 2021-000100
Client: *Appellant*, Westgate Office Park Landowner's Maintenance Association, Inc.

Dear Ms. Rueger

Recently, I filed Notice of Appeal on behalf of the Appellant. The trial roster indicates you were the court reporter for the June 25, 2020 hearing before Judge Bentley Price; if you were not the court reporter please let me know, as well.

I am, requesting a copy of the hearing's transcript. Please let me know the cost to prepare and deliver the transcript and your payment preference.

Please feel free to email me at erika@erikaharrison.com or call my office or my mobile, 843.819.2527 to discuss any concerns you may have about its preparation.

With kindest regards,

Yours truly,

A handwritten signature in black ink that reads 'Erika V. Harrison'.

Erika V. Harrison

EVH:evh

cc: Co-Owners of Westgate Horizontal Property Regime

Subject: Re: Westgate | Transcript | 12/14/2020 | Carney

From: Erika V. Harrison - To: Carney, Krista N. - Cc: - Date: February 26, 2021 at 12:56 PM

Subject: Re: Westgate | Transcript | 6/25/2020 | Rueger

From: Rueger, Joyce - To: erika@erikaharrison.com - Cc: - Date: February 25, 2021 at 1:28 PM

Subject: Westgate | Transcript | 6/15/2020 | Norton

From: Erika V. Harrison - To: pnorton@sccourts.org - Cc: - Date: February 25, 2021 at 8:01 AM, Attachments:
LtrNorton_Jne15Hearing(Westgate_Feb242021).pdf

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PROOF OF SERVICE

I certify that I have served the Motion for Late Filing of Correspondence Requesting Transcripts on Respondent Bay Light, LLC by depositing a copy of it in the United States Mail, postage prepaid, on February 26, 2021, addressed to his attorney of record, G. Thomas Hill of Hill and Hill, LLC 6209 Savannah Hwy. Ravenel, SC 29470 and by electronic mail to his email address of record on February 26, 2021.

February 26, 2021



Erika V. Harrison
SC BAR No. 73024
92 Line St.
Charleston, SC 29403
843.302.1900
Attorney for Appellant



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VIA EMAIL
VIA US MAIL
South Carolina Court of Appeals
Clerk of Court
1220 Senate Street
Columbia, South Carolina 29201

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Feb 26 2021

SC Court of Appeals

February 26, 2021

Re: Bay Light, LLC v. Westgate Office Park Landowner's Maintenance Association, Inc.
Case No.: 2019 -CP-10-6058
EVH File No.: 2020.Westgate.0001

Dear Sir or Madam:

Enclosed please find Appellant's (Defendant) Westgate Office Park Landowner's Maintenance Association, Inc.'s Motion for Late Filing of Correspondence Requesting Transcripts, and a check for the filing fee. Attached to this motion are Exhibit A and B are copies of the communications with the Court Reporters requesting the transcripts.

If you should have any questions regarding this Motion, please feel free to call me.

With kindest regards,

Yours truly,

A handwritten signature in cursive script that reads 'Erika V. Harrison'.

Erika V. Harrison

EVH:evh
cc: G. Thomas Hill (via U.S. Mail and Email)