

94005

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

**RECEIVED**

APPEAL FROM CHARLESTON COUNTY  
Court of Common Pleas

MAR 25 2021

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

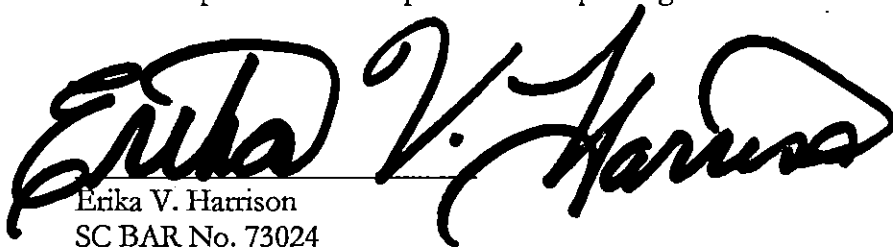
MOTION FOR LATE FILING OF CORRESPONDENCE REQUESTING TRANSCRIPTS

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).

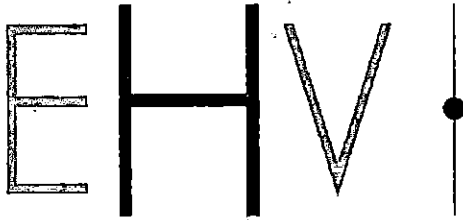
Counsel acknowledges that compliance with the rules is necessary for the orderly administration of appeal and it is incumbent that counsel provides the required materials to comply with the appellate review process. Henning v. Kaye, 307 S.C. 436, 415 S.E.2d 794 (1992).

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*

February 26, 2021



THE LAW OFFICE OF  
**ERIKA V. HARRISON**

PERSISTENCE • PERSEVERANCE • PERSONAL SERVICE

92 LINE STREET | CHARLESTON | SOUTH CAROLINA | 29403  
T | 843.302.1900 E | ERIKA@ERIKAHARRISON.COM

VIA Email [[kncamey@sccourts.org](mailto:kncamey@sccourts.org)]  
Ms. Krista Nicole Carney  
1453 Amanda Park Lane  
Charleston, SC 29412

**RECEIVED**  
MAR 25 2021  
SC Court of Appeals

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](mailto: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,

Erika V. Harrison

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

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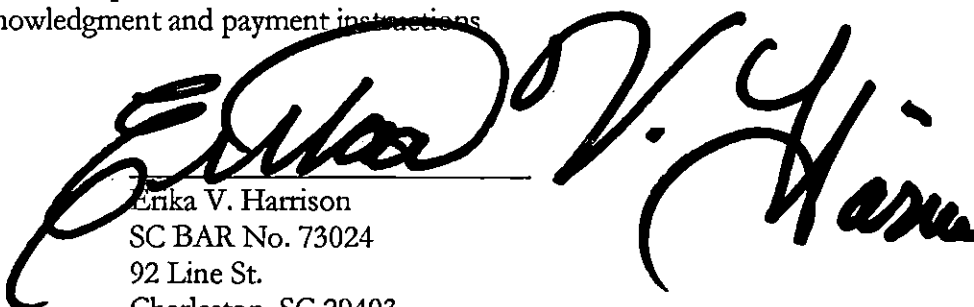
CASE NO: 2019-CP-10-06058

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

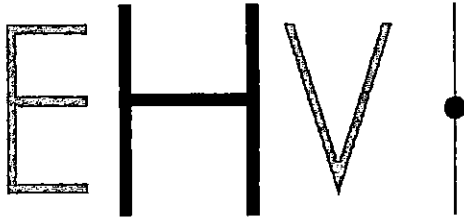
APPELLANT'S EXHIBITS  
MOTION FOR LATE FILING OF CORRESPONDENCES REQUESTING TRANSCRIPTS

- 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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MAR 25 2021

SC Court of Appeals

VIA Email [[pnorton@sccourts.org](mailto: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.

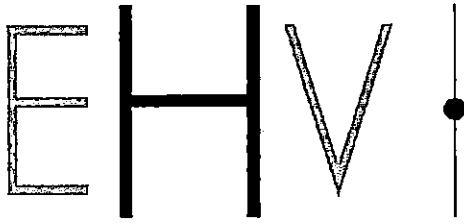
Please feel free to email me at [erika@erikaharrison.com](mailto:erika@erikaharrison.com) or call my office or my mobile, **843.819.2527** to discuss any concerns you may have about its preparation.

With kindest regards,

Yours truly,

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

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MAR 25 2021

SC Court of Appeals

VIA Email [[jrueger@sccourts.org](mailto: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](mailto: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,

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

Dr. Ms. Carney,  
Thank you for reply. If Pre-payment is necessary please let me know.

Kindly,  
Erika

**Erika V. Harrison**  
92 Line Street • Charleston • South Carolina • 29403  
[t] 843.302.1900 [e] erika@erikaharrison.com

Privileged and Confidential. Unless otherwise indicated or obvious from the nature of the following communication, the information contained in this transmission is privileged and confidential information/work product. The communication is intended for the use of the individual or entity named above. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by telephone and destroy any copies, electronic, paper or otherwise, which you may have of this communication.

From: Carney, Krista N. <kncarney@sccourts.org>  
Reply: Carney, Krista N. <kncarney@sccourts.org>  
Date: February 25, 2021 at 9:37:51 AM  
To: Erika V. Harrison <erika@erikaharrison.com>  
Subject: Re: Westgate | Transcript | 12/14/2020 | Carney

**RECEIVED**

**MAR 25 2021**

**SC Court of Appeals**

Good morning Ms. Harrison,

I wanted to let you know I received your request. I will pull it up later today and see if pre-payment is necessary. If it's under 40 pages it's just easier to invoice you when I deliver transcript so there won't be back and forth for a few dollars.

Thank you,

Krista "Nicole" Carney

Official Court Reporter II

9th Judicial Circuit at Large

From: Carney, Krista N.  
Sent: Thursday, February 25, 2021 8:17:07 AM  
To: Erika V. Harrison  
Subject: Re: Westgate | Transcript | 12/14/2020 | Carney

Sent from my iPhone  
There may be some misspellings, since sent from iPhone

On Feb 25, 2021, at 8:02 AM, Erika V. Harrison <erika@erikaharrison.com> wrote:

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

Dear Ms. Carney,  
Hope you are well. Attached is formal letter requesting transcript from a hearing in Dec 2020. Please let me know your fee to prepare the transcript and your payment preference.

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

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

Ms. Harrison,

I received your request for the transcript. I estimate the cost of the transcript to be \$103.75. If you will forward a check to me in that amount I'll be happy to produce the transcript for you.

If you have any questions, please let me know. Thank you.

Joy Rueger

Joy Rueger, CVR-M  
Official Circuit Court Reporter  
9th Judicial Circuit  
P.O. Box 1472  
Johns Island, SC 29457

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From: Erika V. Harrison <erika@erikaharrison.com>  
Sent: Thursday, February 25, 2021 8:00:15 AM  
To: Rueger, Joyce  
Subject: Westgate | Transcript | 6/25/2020 | Rueger

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

Dear Ms. Rueger,  
PHope you are well. Attached is formal letter requesting transcript from a hearing in June 2020. Please let me know your fee to prepare the transcript and your payment preference.  
The case information is below:  
Bay Light, LLC v. Westgate Office Park Landowner's Maintenance Association, Inc.  
Charleston County C/A No.: 2019 -CP-10-6058  
Judge: Bentley Price

Kindly,  
Erika

Erika V. Harrison  
92 Line Street • Charleston • South Carolina • 29403  
[t] 843.302.1900<tel://843.302.1900> [e] erika@erikaharrison.com<mailto:erika@erikaharrison.com>

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<[https://urldefense.com/v3/\\_http://erikaharrison.com/\\_;!!JHVHxrUang!H5gDI9-ivLGXiPVec5jJZidHq3PjOaYB5XFBIVZkzhDAmnP2gilA5C-WUiWk21Cg\\$](https://urldefense.com/v3/_http://erikaharrison.com/_;!!JHVHxrUang!H5gDI9-ivLGXiPVec5jJZidHq3PjOaYB5XFBIVZkzhDAmnP2gilA5C-WUiWk21Cg$)>

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**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

Dear Ms. Norton Hope you are well. Attached is formal letter requesting transcript from a hearing in June 2020. Please let me know your fee to prepare the transcript and your payment preference.

The case information is below:

Bay Light, LLC v. Westgate Office Park Landowner's Maintenance Association, Inc.

Charleston County C/A No.: 2019 -CP-10-6058

Judge: Bentley Price

Kindly,  
Erika

The case information is below:

Bay Light, LLC v. Westgate Office Park Landowner's Maintenance Association, Inc.

Charleston County C/A No.: 2019 -CP-10-6058

Judge: Bentley Price

Kindly,  
Erika

**Erika V. Harrison**  
92 Line Street • Charleston • South Carolina • 29403  
[t] 843.302.1900 [e] [erika@erikaharrison.com](mailto:erika@erikaharrison.com)

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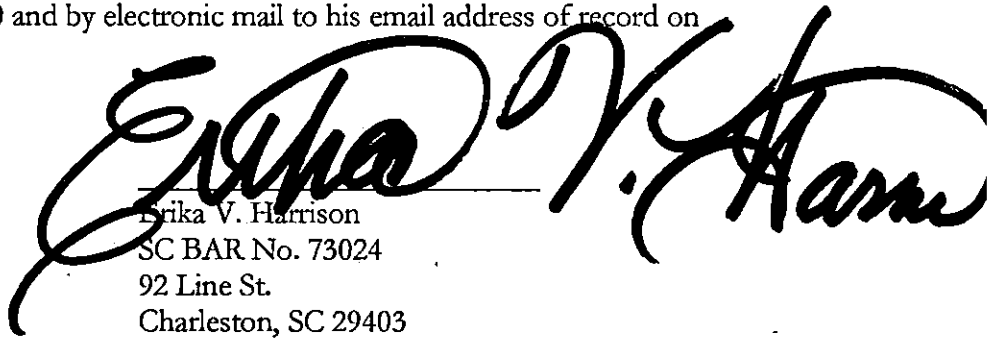
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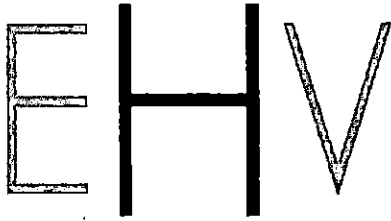
PROOF OF SERVICE

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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**SC Court of Appeals**

VIA EMAIL

VIA US MAIL

South Carolina Court of Appeals  
Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29201

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,

Erika V. Harrison

EVH:evh

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

<b>1</b>	\$1.20 US POSTAGE 2 OZ. FIRST-CLASS MAIL PERmits MAIL	0625061324763 12913432 PT000 29413
		<small>RETAIL</small> <small>ADDRESS</small> <small>ONLY</small> <small>03/28/2021</small>
<b>USPS FIRST CLASS MAIL®</b>		
<small>TO:</small> Miss Erika V. Harrison <small>TO:</small> Law Office of Erika V. Harrison <small>TO:</small> 82 Line St. <small>TO:</small> CHARLESTON SC 29413-0956		
<b>C076</b>		
<small>SHIP TO:</small> South Carolina Court of Appeals <small>SHIP TO:</small> Clerk of Court <small>SHIP TO:</small> 1220 Senate St <small>SHIP TO:</small> COLUMBIA SC 29201-3769		
		
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MAR 25 2021		
SC Court of Appeals		

