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**Jul 06 2021**

**SC Court of Appeals**

**MOTION REQUESTING PERMISSION TO  
ORDER TRANSCRIPT OUTSIDE OF FILING DEADLINES**

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

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APPEAL FROM CHESTER COUNTY

Court of Common Pleas

Brian M.. Gibbons, Circuit Court Judge

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Appellate Case No. 2021-000595

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Ronald Gaines,

Appellant,

v.

Love and Charity Baptist Church,

Respondent,

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**MOTION REQUESTING PERMISSION**

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Ronald Gaines appeals Order Granting Respondent's Motion to Compel and striking answers of Defendant by the Honorable Brian M. Gibbons dated May 9, 2021. Appellant received written Notice of Entry of this Order sometime after May 3, 2021 via USPS mail delivery.

I am requesting that the Court grant permission to order a transcript outside of the filing deadlines due to inadvertent excusable neglect to note the deadline date for the ordering of the transcript.

I humbly request that the Appellate Court allow this case to move forward and to be heard on the merits.

(Signature Page to follow)

July 1st, 2021

*Other Counsel of Record:*

D. Bradley Jordan  
546 East Main Street  
P.O. Box 11785  
Rock Hill, SC 29731  
Attorney for Respondent

/s/ Neil T. Phillips

The Law Office of Neil T. Phillips, LLC  
30 N. Congress Street, Suite 106  
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Phone: 803 - 810 - 5423  
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Attorney for Appellant

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**PROOF OF SERVICE**

I certify that I have served the **MOTION REQUESTING PERMISSION TO ORDER TRANSCRIPT OUTSIDE OF FILING DEADLINES** and **TRANSCRIPT REQUEST FORM** by mailing and emailing a copy of the document to Respondent's Attorney of Record, D. Bradley Jordan and to Shelby Spencer, on July 6, 2021.

email address: [bradjordan@comporium.net](mailto:bradjordan@comporium.net);  
[sspencer@sccourts.org](mailto:sspencer@sccourts.org)

July 6, 2021

/s/ Neil T. Phillips

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Attorney for Appellant

*Other Counsel of Record:*

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[bradjordan@comporium.net](mailto:bradjordan@comporium.net)  
Attorney for Respondent

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**Ms. Shelby Spencer**  
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**SC Court of Appeals**

Neil T. Phillips  
Attorney-at-Law



Email: [neil@neilphillipslaw.com](mailto:neil@neilphillipslaw.com)

Date: July 6, 2021

**VIA EMAIL and Standard USPS Mail delivery**

Ms. Shelby Spencer  
Appeals Specialist II  
SC Court of Appeals  
1220 Senate Street  
Columbia, SC 29201  
[sspencer@sccourts.org](mailto:sspencer@sccourts.org)

RE: Appellate Case No.: 2021-000595

Shelby:

I have enclosed/attached the Proof of Service for the MOTION REQUESTING PERMISSION TO ORDER TRANSCRIPT OUTSIDE OF FILING DEADLINES and TRANSCRIPT REQUEST FORM. I have also copied the opposing counsel, Mr. Brad Jordan.

The Proof of Service was not provided with the initial delivery of the documents sent to you July 1, 2021.

Please confirm your receipt of this email and please acknowledge that I have followed all guidelines properly.

Best regards  
Neil T. Phillips, Esq.

Enclosures