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JUL 08 2021

**MOTION REQUESTING PERMISSION TO  
ORDER TRANSCRIPT OUTSIDE OF FILING DEADLINES** SC Court of Appeals

THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM CHESTER COUNTY

Court of Common Pleas

Brian M.. Gibbons, Circuit Court Judge

Appellate Case No. 2021-000595

Ronald Gaines,

Appellant,

v.

Love and Charity Baptist Church,

Respondent,

**MOTION REQUESTING PERMISSION**

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  
York, South Carolina 29745  
Phone: 803 - 810 - 5423  
Fax: 877 - 502 - 9001  
Email: [neil@neilphillipslaw.com](mailto:neil@neilphillipslaw.com)  
Attorney for Appellant.

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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](mailto: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 <u>Neil Terrence Phillips</u>		Phone Number <u>803 810 5423</u>	Email Address <u>Neil@neilphillipslaw.com</u>
Mailing Address <u>30 N Congress St Suite 106</u>		City <u>York</u>	State <u>SC</u> Zip Code <u>29745</u>
Transcript Information			
Docket Number <u>2019CPI200321</u>		Case Caption (i.e. State v. John Doe or Smith v. Smith) <u>Love and Charity Baptist Church v. Ronald Gaines et. al.</u>	
Date(s) of Proceeding <u>April 19, 2021</u>	Circuit <input checked="" type="checkbox"/>	County <u>Chester</u>	
Presiding Judge <u>Brian M. Gibbons</u>		Expedited    Yes <input type="checkbox"/> No <input type="checkbox"/>	
Court Reporter(s) <u>Michael Cary Watkins</u>		Opposing Counsel <u>D. Bradley Jordan</u>	

Requestor's Signature: Neil T. Phillips  
(Typed name will serve as signature)

Date: 6/30/21

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 _____

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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

The Law Office of Neil T. Phillips, LLC

30 N. Congress Street, Suite 106

York, South Carolina 29745

Phone: 803 - 810 - 5423

Fax: 877 - 502 - 9001

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

Attorney for Appellant

*Other Counsel of Record:*

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P.O. Box 11785  
Rock Hill, South Carolina 29731  
[bradjordan@comporium.net](mailto:bradjordan@comporium.net)  
Attorney for Respondent

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

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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

**The Law Office of Neil T. Phillips, LLC**

30 North Congress Street, Suite 106  
York, South Carolina 29745

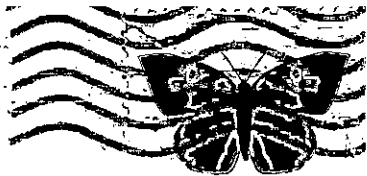


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Appeals Specialist II  
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