

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

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Sep 21 2021

SC Court of Appeals

APPEAL FROM BEAUFORT COUNTY
Common Pleas Court

Carmen Mullen, Common Pleas Judge

Appellate Case No: 2021-000862

Zachary Z. Zoul, and Zoul Hospitality, LLC d/b/a Hospitality Advisors Group,
Respondents

v.

Lawrence Leary and Old Town Bluffton Inn, LLC,
Appellants.

MOTION TO REQUEST TRANSCRIPT OUTSIDE OF FILING DEADLINE

Appellants, Lawrence Leary and Old Town Bluffton Inn, LLC hereby moves the Court for an Order extending the timeline for requesting the transcript of record. Counsel believes that this request was made within the times set forth in the rules, but out of an abundance of caution the Appellants move for an extension of the timeline for requesting a transcript of record. The requests for the transcript are attached Exhibit A.

GALVIN LAW GROUP, LLC

/s/ Gregory Michael Galvin, Esq.

Gregory Michael Galvin, Esq.

P.O. Box 887

Bluffton, South Carolina 29910

843-227-2231

888-362-0714 Fax

ggalvin@galvinlawgroup.com

Bluffton, South Carolina

21st day of **September, 2021**

EXHIBIT A

Fw: Zachary Zoul v. Lawrence Leary, et al.; Beaufort County Court of Common Pleas, Civil Action # 2019-CP-07-117; Appeal # 2021-000862

Greg Galvin <ggalvin@galvinlawgroup.com>

Tue 9/21/2021 9:24 AM

To: Marty McCay <mmccay@galvinlawgroup.com>



Gregory Michael Galvin, Esq. | Attorney at Law

Galvin Law Group, LLC
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From: Transcripts <transcripts@sccourts.org>

Sent: Monday, September 20, 2021 10:13 AM

To: Ward Borden <WBorden@jsplaw.net>; Transcripts <transcripts@sccourts.org>

Cc: Greg Galvin <ggalvin@galvinlawgroup.com>

Subject: RE: Zachary Zoul v. Lawrence Leary, et al.; Beaufort County Court of Common Pleas, Civil Action # 2019-CP-07-117; Appeal # 2021-000862

Good morning.

Your transcript request has been received and will be sent to a transcriptionist for production. The transcriptionist will be in touch with you regarding the estimated cost for this transcript.

Thank you.

Tammie M. Holmes
Court Reporter/Interpreter Manager
South Carolina Judicial Branch
1220 Senate Street, Ste. 200
Columbia, SC 29201
tholmes@sccourts.org
803-734-1825

From: Ward Borden <WBorden@jsplaw.net>

Sent: Monday, September 20, 2021 9:40 AM

To: Transcripts <transcripts@sccourts.org>; Holmes, Tammie <tholmes@sccourts.org>

Cc: 'ggalvin@galvinlawgroup.com' <ggalvin@galvinlawgroup.com>

Subject: Zachary Zoul v. Lawrence Leary, et al.; Beaufort County Court of Common Pleas, Civil Action # 2019-CP-07-117; Appeal # 2021-000862

***** EXTERNAL EMAIL:** This email originated from outside the organization. Please exercise caution before clicking any links or opening attachments. ***
To Whom It May Concern:

Please find attached a Transcript Request in connection with the above-referenced matter. Our law firm represents the Respondent in the appeal. Please let me know of what is required further and we will follow up.

Respectfully,

JONES, SIMPSON & NEWTON, P.A.

/s/ F. Ward Borden

~~~ CONFIDENTIALITY NOTICE ~~~ This message is intended only for the addressee and may contain information that is confidential. If you are not the intended recipient, do not read, copy, retain, or disseminate this message or any attachment. If you have received this message in error, please contact the sender immediately and delete all copies of the message and any attachments.

**RE: Zachary Zoul et al. v. Lawrence Leary et al.-Case No. 2019-CP-07-117**

Transcripts <transcripts@sccourts.org>

Tue 8/24/2021 4:36 PM

To: Marty McCay <mmccay@galvinlawgroup.com>

Your DCRP request was received, it will be sent to a court reporter who will provide you with an estimated cost and delivery date.

---

**From:** Marty McCay <mmccay@galvinlawgroup.com>

**Sent:** Tuesday, August 24, 2021 3:39 PM

**To:** Transcripts <transcripts@sccourts.org>

**Subject:** Re: Zachary Zoul et al. v. Lawrence Leary et al.-Case No. 2019-CP-07-117

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

Thank you so much!

Attached is the completed transcript request form. I noticed the form said we needed to send to the court reporter also and there was a link to their email addresses, but I could not click the link and do not know who the court reporter was. How would I go about finding out that information?

Thank You!

**Marty McCay**  
**Paralegal to Gregory M. Galvin, Esq.**  
**Galvin Law Group**  
**P.O. Box 887**  
**Bluffton, SC 29910**  
**(843) 405-2934**

---

**From:** Transcripts <transcripts@sccourts.org>

**Sent:** Tuesday, August 24, 2021 2:09 PM

**To:** Marty McCay <mmccay@galvinlawgroup.com>

**Subject:** RE: Zachary Zoul et al. v. Lawrence Leary et al.-Case No. 2019-CP-07-117

Please complete the attached transcript request form

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**From:** Marty McCay <mmccay@galvinlawgroup.com>

**Sent:** Tuesday, August 24, 2021 10:59 AM

**To:** Transcripts <transcripts@sccourts.org>

**Cc:** Greg Galvin <ggalvin@galvinlawgroup.com>

**Subject:** Zachary Zoul et al. v. Lawrence Leary et al.-Case No. 2019-CP-07-117

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

Good Morning!

Please find this email as our request for the transcript of trial in the above-referenced matter (Zoul v. Leary, Case No.: 2019-CP-07-117 on May 18, 2021 at 9:30 a.m. before Judge Mullen. Please let us know if you need any additional information.

Thank you,

**Marty McCay**  
**Paralegal to Gregory M. Galvin, Esq.**  
**Galvin Law Group**  
**P.O. Box 887**  
**Bluffton, SC 29910**  
**(843) 405-2934**

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Respondents

v.

Lawrence Leary and Old Town Bluffton Inn, LLC,
Appellants.

I hereby certify that I served a copy of the **MOTION TO REQUEST TRANSCRIPT OUTSIDE OF FILING DEADLINE** electronically, or by mailing a true and correct copy of same to the following, with adequate postage affixed thereto, addressed as follows on the day set forth below:

Ward Borden, Esq.
Jones Simpson and Newton, PA
PO Box 1938
Bluffton, SC 29910
Attorney(s) for All Plaintiffs

South Carolina Office of Court Administration
1120 Senate Street, Suite 200
Columbia, S.C., 29201

GALVIN LAW GROUP, LLC

/s/ Gregory Michael Galvin, Esq.

Gregory Michael Galvin, Esq.

P.O. Box 887

Bluffton, South Carolina 29910

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ggalvin@galvinlawgroup.com

Bluffton, South Carolina

21st day of **September, 2021**