

MOTION REQUESTING PERMISSION TO
ORDER TRANSCRIPT OUTSIDE OF FILING DEADLINES

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)

RECEIVED

Sep 30 2021

SC Court of Appeals

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
Attorney for Appellant