

STATE OF SOUTH CAROLINA)) COUNTY OF CHARLESTON)) Beatrice Youngblood)))) vs.)) Randy Williams Edwards and RWE Trucking) Company)) Defendant.)	IN THE COURT OF COMMON PLEAS FOR THE NINTH JUDICIAL CIRCUIT CASE NO.: 2019-CP-10-00347 MOTION AND ORDER INFORMATION FORM AND COVERSHEET
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Plaintiff's Attorney: Nadia Baig, Bar No. _____ Address: The Lokey Law Firm, LLC 775 Saint Andrews Blvd. Charleston, SC 29407-7167 Phone: (843) 202-0675 Fax (843) 589-1042 E-mail: nsbaig@lokeylawfirm.com; jslee@lokeylawfirm.com Other: _____	Defendant's Attorney: Penn W. Ely Bar No. 100604 Address: CLAWSON and STAUBES, LLC 126 Seven Farms Drive, Suite 200 Charleston, South Carolina 29492- 8144 Phone: (843) 577-2026 Fax: (843) 722-2867 E-mail: pely@clawsonandstaubes.com
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MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III)
 FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III)
 PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)

SECTION I: Hearing Information

Nature of Motion: Proposed Consent Scheduling Order
 Estimated Time Needed: Court Reporter Needed: YES / NO

SECTION II: Motion/Order Type

Written motion attached
 Form Motion/Order
 I hereby move for relief or action by the court as set forth in the attached proposed order.

p.p. Stephen A. Griffith, Jr.
 Signature of Attorney for Plaintiff / Defendant

Date submitted: 8/23/19

SECTION III: Motion Fee

PAID - AMOUNT: \$ 25
 EXEMPT: (check reason)

Rule to Show Cause in Child or Spousal Support
 Domestic Abuse or Abuse and Neglect
 Indigent Status State Agency v. Indigent Party
 Sexually Violent Predator Act Post-Conviction Relief
 Motion for Stay in Bankruptcy
 Motion for Publication Motion for Execution (Rule 69, SCRPC)
 Proposed order submitted at request of the court; or,
 reduced to writing from motion made in open court per judge's instructions
 Name of Court Reporter: _____
 Other: _____

<p style="text-align: center;">JUDGE'S SECTION</p> <input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____	JUDGE CODE _____ Date: _____
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CLERK'S VERIFICATION

Collected by: _____ Date Filed: _____
 MOTION FEE COLLECTED: \$ _____
 CONTESTED - AMOUNT DUE: \$ _____

2019-CP-10-347

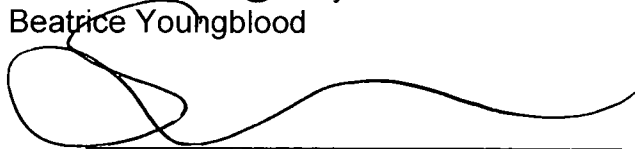
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Proposed Consent Scheduling Order was served upon the following parties on the 21 day of August, 2019, via:

<input checked="" type="checkbox"/>	United States Postal Service
<input type="checkbox"/>	Facsimile
<input checked="" type="checkbox"/>	Electronic Email
<input type="checkbox"/>	Via Hand Delivery

2019 SEP 17 PM 2:51
JULIE J. ARNOLD
CLERK OF COURT

Nadia Baig
The Lokey Law Firm, LLC
775 Saint Andrews Blvd.
Charleston, SC 29407-7167
Email Address: nsbaig@lokeylawfirm.com; jslee@lokeylawfirm.com
Attorney For: Beatrice Youngblood



Paralegal

Susana Herrero

From: Nadia Baig <nsbaig@lokeylawfirm.com>
Sent: August 22, 2019 8:24 AM
To: Susana Herrero
Cc: jslee@lokeylawfirm.com; Team Ely
Subject: Re: Youngblood, Beatrice vs. Edwards, Randy and RWE Trucking Company (File #: 20190593.000) - Claim No: 112852Z01

Follow Up Flag: Follow up
Flag Status: Flagged


Yes, I approve.

Nadia S. Baig
Attorney

THE LOKEY LAW FIRM, LLC
775 Saint Andrew's Boulevard
Charleston, SC 29407-7167
Office: (843) 202-0675
Fax: (843) 589-1042
Email: nsbaig@lokeylawfirm.com
www.lokeylawfirm.com

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 Please consider the environment before printing this email.

On Wed, Aug 21, 2019 at 6:02 PM Susana Herrero <sherrero@clawsonandstaubes.com> wrote:

Dear Nadia,

We are proposing to file a consent scheduling order (see attached) with mediation deadline of 1/1/20 and TNB date of 4/1/20. Let me know if you approve and I will file it. Thank you,



Penn W. Ely
Licensed in SC
pely@clawsonandstaubes.com

August 22, 2019

File No.: 20190593.000

The Honorable Julie J. Armstrong
Charleston County Clerk of Court
100 Broad St Ste 106
Charleston, SC 29401-2210

Re: Beatrice Youngblood vs. Randy Williams Edwards and RWE Trucking Company
Case No.: 2019-CP-10-00347

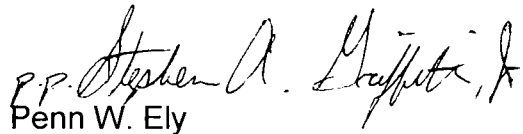
Dear Ms. Armstrong:

Enclosed please find the original and one (1) copy of Proposed Consent Scheduling Order to be filed in the above-referenced case. Please file the original and return a stamped, filed copy of the Proposed Consent Scheduling Order in the self-addressed, stamped envelope provided for your convenience. Also enclosed is our check in the amount of Twenty-five (\$25.00) Dollars representing the administrative fee for this request as well as the docketing form required by your office.

By copy of this letter, I am serving a copy of the Proposed Consent Scheduling Order upon counsel of record, along with a Certificate of Service.

Very truly yours,

CLAWSON and STAUBES, LLC


Penn W. Ely

PWE/sfh

Enclosure

cc: Nadia Baig, Esq.