

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

**RECEIVED**

JUN 27 2022

**SC Court of Appeals**

APPEAL FROM GREENVILLE COUNTY  
Charles B. Simmons, Jr., Master-in-Equity

Appellate Case No. 2020-000390

Francisco Nicolas Miguel, Respondent,

v.

Palmetto Asset Investment, LLC, Gabriel Angel Prestegui Gomez, and A. Kevin Hunter, II,  
Greenville County Tax Collector, Defendants

Of which Palmetto Asset Investments, LLC is the Appellant.

ITEMIZED STATEMENT OF COSTS

The Appellate Court is requested to tax the following costs against Palmetto Asset  
investments, LLC:

COSTS TAXABLE UNDER RULE 222, SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Attorney's Fee Provided By Rule 222(b), SCACR		Per Order	\$2,500.00	
<b>TOTAL</b>			<b>\$2,500.00</b>	

I, Max T. Hyde, Jr., do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was (mailed to/served upon) opposing counsel.

Max T. Hyde, Jr.  
(Signature)  
Attorney for Respondent

Sworn to and subscribed before me this  
24<sup>th</sup> day of June, 2022

[Signature]  
Notary Public for South Carolina

My Commission Expires: April 24, 2028



# Matter History Report

Report Date: 6/24/2022  
Report Time: 1:09PM  
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## Hyde Law Firm

Client Number: 10044 - Francisco Miguel  
Matter Number: 18-0032- Miguel, Francisco (RE-LIT)  
Matter Type: REAL ESTATE LITIGATION  
Date Range: 01/01/2018 Thru 06/24/2022  
Billing Mode: Hourly

Date	Timekeeper	Description	Time Spent	Amount
FEES				
03/05/2018	REG	Prepare FOIA Requests.	0.30	\$90.00
06/05/2018	REG	Prepare letter to GVL Co. Atty.	0.20	\$60.00
07/09/2018	REG	Telephone Call with F. Miguel. Prepare Summons and Complaint.	2.00	\$600.00
07/11/2018	REG	Prepare and file Complaint.	1.10	\$330.00
07/20/2018	REG	Prepare and file Aff. of Service.	0.10	\$30.00
08/07/2018	REG	Prepare discovery and correspondence to County.	0.70	\$210.00
08/20/2018	REG	Review documents from J. Underwood. Prepare letter to J. Underwood regarding unauthorized practice of law.	1.00	\$300.00
09/06/2018	REG	Review Answer of Palmetto.	0.20	\$60.00
10/02/2018	REG	Review interrogatories from Palmetto Asset Investment.	0.10	\$30.00
11/26/2018	BP	Prep. Cert. of Service	0.10	\$12.50
01/15/2019	REG	Review discovery and common law. Email opposing counsel regarding scheduling depositions.	0.50	\$150.00
03/01/2019	BP	Prep. Notice of Depos for 3 parties Prep. COS for each Notice Letter to J. Wile Correspondence with J. Wile Arrange for Court Reporter	0.70	\$87.50
03/12/2019	REG		1.10	\$330.00
03/12/2019	REG	Prepare for deposition.	1.50	\$450.00
03/13/2019	REG	Prepare for Deposition. Travel. Depositions.	2.90	\$870.00

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Date	Timekeeper	Description	Time Spent	Amount
05/21/2019	REG	Research tax sale notice issues. Telephone Call with F. Miguel. Prepare Order of Reference.	1.80	\$540.00
05/31/2019	REG	Meet with Francisco.	0.50	\$150.00
09/13/2019	REG	Prepare motion for summary judgment.	1.80	\$540.00
09/16/2019	REG	Prepare Summary Judgment Motion and Affidavit.	3.00	\$900.00
11/14/2019	REG	Prepare for hearing. Summary Judgment Hearing. Travel to Greenville.	3.20	\$960.00
12/06/2019	REG	Conference call with opposing counsel and Judge Simmons.	0.40	\$120.00
12/30/2019	REG	Prepare Order.	3.50	\$1,050.00
05/21/2020	REG	Research case law on issues presented by Appellant.	0.60	\$180.00
06/08/2020	REG	Research common law. Prepare brief.	2.00	\$600.00
06/09/2020	REG	Research common law and prepare brief.	1.50	\$450.00
06/10/2020	REG	Prepare brief.	6.00	\$1,800.00
06/11/2020	REG	Prepare Brief and Designation of Matter.	6.50	\$1,950.00
07/27/2020	REG	Prepare Final Brief.	1.00	\$300.00
05/09/2022	MTH	meeting with client	0.30	\$114.00
06/02/2022	SNL	Research Motion for Costs on Appeal	0.30	\$75.00
06/02/2022	MTH	CREDIT for balance over \$4,000.00 PER MTH. Client paid \$4,000.00 cash, and Max waived additional amount due through 6.2.22	0.00	(\$212.49)
06/24/2022	SNL	Draft initial Motion for Costs	0.50	\$125.00
		<b>SUMMARY - By Time Ticket Type</b>		

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## Hyde Law Firm

Date	Timekeeper	Description	Time Spent	Amount
		Billable:	45.40	\$13,464.00
		Trial:	0.00	\$0.00
		Flat Charge:	0.00	(\$212.49)
		Non-Billable:	0.00	\$0.00
		No Charge:	0.00	\$0.00
		isc No Charge:	0.00	\$0.00
		<b>Total:</b>	<b>45.40</b>	<b>\$13,251.51</b>

### SUMMARY - By Timekeeper

REG	Billable Timekeeper Hours & Fees. .	43.50	\$13,050.00
BP	Billable Timekeeper Hours & Fees. .	0.80	\$100.00
MTH	Billable Timekeeper Hours & Fees. .	0.30	\$114.00
SNL	Billable Timekeeper Hours & Fees. .	0.80	\$200.00
MTH	Flat Charge Hours . . . . .	0.00	(\$212.49)
	Misc. Fee Debits & Credits. . . . .	-	\$0.00
	<b>Total:</b>	<b>45.40</b>	<b>\$13,251.51</b>

### HARD COSTS

07/11/2018	Filing Fee	\$0.00
04/09/2019	Vendor: A. William Roberts, Jr. & Associates; Invoice #: 22007; Date: 4/9/2019 - Court Reporting-Inv. 22007	\$459.19
05/24/2019	Filing Fee	\$31.74
06/20/2019	Vendor: Greenville County Master In Equity; Date: 6/20/2019 - Filing Fee-Case No. 2018-23-03713 (Miguel vs. Palmetto Asset Investments)	\$50.00
06/21/2019	Courier Charges- UPS to G'Ville MIE	\$25.68
09/25/2019	Filing Fee	\$31.74
07/28/2021	Courier Charges- UPS to SC Court of Appeals	\$28.35
	<b>Sub Total:</b>	<b>\$626.70</b>

### SOFT COSTS

06/05/2018	Postage	\$1.41
08/07/2018	Postage	\$1.41
08/21/2018	Postage	\$1.41
11/26/2018	Postage	\$1.44
12/03/2018	Postage	\$2.67
10/31/2019	Postage	\$1.00
10/31/2019	Postage	\$15.70
01/10/2020	Postage	\$0.65

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## Hyde Law Firm

Date	Timekeeper	Description	Time Spent	Amount	
			<b>Sub Total:</b>	<u>\$25.69</u>	
			<b>Total Costs:</b>	<u>\$652.39</u>	
			<b>Billed Amount</b>	<b>Payment Amount</b>	<b>Amount Due</b>
		Fees:	\$14,121.51	(\$13,996.51)	\$125.00
		Hard Costs:	\$626.70	(\$626.70)	\$0.00
		Soft Costs:	\$25.69	(\$25.69)	\$0.00
		Taxes:	\$0.00	\$0.00	\$0.00
		Late Charges:	\$0.00	\$0.00	\$0.00
		<b>Totals:</b>	<u>\$14,773.90</u>	<u>(\$14,648.90)</u>	<u>\$125.00</u>

Date of Last Payment: 06/02/2022

Date of Last Bill: 06/24/2022

# Matter Trust Activity

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## Hyde Law Firm

Date Range : 01/01/2018 - 06/24/2022

Client: 10044 - Francisco Miguel

Matter: 18-0032 - Miguel, Francisco (RE-LIT)

Date	Debit	Credit	Description	Account Number	On Hold	Check Number	Payee
02/07/2018	\$3,500.00	\$0.00	retainer - paid in cash	11048.00	No		Trust Deposit
03/06/2018	\$0.00	\$90.00	Invoice 28326	11048.00	No	12320	Hyde Law Firm
06/06/2018	\$0.00	\$61.41	Invoice 28724	11048.00	No	12550	Hyde Law Firm
07/11/2018	\$0.00	\$600.00	Invoice 28884	11048.00	No	12613	Hyde Law Firm
07/17/2018	\$0.00	\$330.00	Invoice 28914	11048.00	No	12671	Hyde Law Firm
07/18/2018	\$0.00	\$1.10	FOIA request copies	11048.00	No	12672.1	Greenville County
07/18/2018	\$0.00	\$250.00	Invoice 18-1177	11048.00	No	12673.1	Big Bear Process Service
07/18/2018	\$1.10	\$0.00	Adjustment for Voided Check #: 126	11048.00	No	12672.1	Greenville County
07/18/2018	\$0.00	\$1.10	FOIA copies	11048.00	No	12674	Greenville County
07/25/2018	\$0.00	\$30.00	Invoice 28941	11048.00	No	12683	Hyde Law Firm
08/08/2018	\$0.00	\$210.00	Invoice 29025	11048.00	No	12733	Hyde Law Firm
08/15/2018	\$0.00	\$1.41	Invoice 29056	11048.00	No	12751	Hyde Law Firm
08/22/2018	\$0.00	\$301.41	Invoice 29086	11048.00	No	12757	Hyde Law Firm
09/12/2018	\$0.00	\$60.00	Invoice 29187	11048.00	No	12809	Hyde Law Firm
09/12/2018	\$60.00	\$0.00	Adjustment for Voided Check #: 128	11048.00	No	12809	Hyde Law Firm
09/14/2018	\$0.00	\$60.00	Invoice 29187	11048.00	No	12810.1	Hyde Law Firm
10/03/2018	\$0.00	\$30.00	Invoice 29298	11048.00	No	12849	Hyde Law Firm
11/28/2018	\$0.00	\$13.94	Invoice 29530	11048.00	No	12956	Hyde Law Firm
12/05/2018	\$0.00	\$2.67	Invoice 29587	11048.00	No	12980	Hyde Law Firm
01/16/2019	\$0.00	\$150.00	Invoice 29836	11048.00	No	12992	Hyde Law Firm
03/07/2019	\$0.00	\$87.50	Inv. 30089	11048.00	No	13023.1	Hyde Law Firm
03/13/2019	\$0.00	\$780.00	Invoice 30141	11048.00	No	13024.1	Hyde Law Firm
03/14/2019	\$0.00	\$500.56	Inv. 30174	11048.00	No	13026	Hyde Law Firm
01/10/2020	\$5,400.00	\$0.00	CASH from F. Miguel, to be applied t	11048.00	No		Trust Deposit
03/27/2020	\$0.00	\$5,400.00	INTERNAL Abacus move from SS t	11048.00	No	13054	Hyde Law Firm
03/27/2020	\$5,400.00	\$0.00	INTERNAL transfer from SS Trust t	11025.00	No		Trust Deposit
03/27/2020	\$0.00	\$5,115.14	multiple invoices payment	11025.00	No	14297	Hyde Law Firm
05/28/2020	\$0.00	\$180.00	inv 32833	11025.00	No	14416.1	Hyde Law Firm
06/11/2020	\$0.00	\$104.86	inv 32887	11025.00	No	14452	Hyde Law Firm

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## Hyde Law Firm

Date Range : 01/01/2018 - 06/24/2022

Client: 10044 - Francisco Miguel

Matter: 18-0032 - Miguel, Francisco (RE-LIT)

Date	Debit	Credit	Description	Account Number	On Hold	Check Number	Payee
	<u>\$14,361.10</u>	<u>\$14,361.10</u>					
Balance:	<u>\$0.00</u>						