

96775

THE STATE OF SOUTH CAROLINA  
IN THE COURT OF APPEALS

**RECEIVED**

JUL 26 2022

SC Court of Appeals

Barbara Killingsworth and )  
Brian Killingsworth, Respondent )

v. )

No. 2020-CP-07-00091

Stokes Brown Toyota of Hilton Head, )  
Appellant )

Appellate Case No. 2020-000883

---

APPEAL FROM BEAUFORT COUNTY

The Honorable Carmen T. Mullen, Circuit Court Judge

---

Opinion No. 2022-UP-290  
Submitted June 1, 2022--Filed July 6, 2022

---

**MOTION FOR TAXABLE COSTS**

---

Christy Kellerhals of HawkLaw, PA of Columbia, for Respondents  
Barbara Killingsworth and Brian Killingsworth

Bradford N Martin, Esq, Laura W.H. Teer, Esq of Bradford Neal  
Martin & Associates of Greenville for Appellant Stokes Brown  
Toyota of Hilton Head

Pursuant to Rules 54(d), (e), and 68 of the South Carolina Rules of Civil Procedure, and Rule 222 of the South Carolina Appellate Court Rules, the Plaintiff respectfully moves for taxation of costs.

Plaintiff is the prevailing party and is entitled to recover their taxable costs. Rule 54(d), of the South Carolina Rules of Civil Procedure states as follows:

Except when express provision therefor is made

either in a statute or in these rules, costs shall be allowed as of course to the prevailing party unless the court otherwise directs.

Considering the above authorities, the following taxable costs must be assessed against the Defendant:

1. Filing fees;

\$ 180.32

2. Motion fees;

\$ 50.00

3. Fees and costs associated with compilation and final briefs;

\$ 361.17

4. Cost of court reporter transcript;

\$ 58.84

5. Fees for exemplification and Copies of Papers Necessarily Obtained for Trial;

\$ 31.84

6. Attorney's Fees as allowed under Rule 222 of SC Appellate Court Rules;

\$ 2,500.00

Total: \$ 3,182.17

By my oath, I state that the above costs listed above were incurred during the defense of this case.

*{Signature Block on Next Page}*

*Christy Kellerhals*

Christy Kellerhals (SC Bar No 102066)  
HawkLaw, PA  
PO Box 5048  
Spartanburg, SC 29304  
(864) 574-8801

Attorneys for Respondents Barbara Killingsworth  
and Brian Killingsworth

Sworn before me this

20<sup>th</sup> day of July

*Anthony Quarles*

Notary Public for 7-20-25  
My commission expires:





**HAWKLAW**

P.O. Box 5048, Spartanburg, SC 29304

**RECEIVED**

JUL 26 2022

SC Court of Appeals

GREENVILLE SC 296

22 JUL 2022 PM 3 L



The Honorable Jenny Abbott Kitchings  
Clerk, SC Court of Appeals  
PO Box 11629  
Columbia, SC 29211

29211-162929

