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Aug 15 2022

SC Court of Appeals

**THE STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS**

APPEAL FROM HORRY COUNTY
COURT OF COMMON PLEAS
THE HONORABLE LARRY B. HYMAN, JR.
CIRCUIT COURT JUDGE

APPELLATE CASE NO. 2019-001185
CIVIL ACTION NO. 2018-CP-26-06576

Cleo Bertiaux as Guardian for Kathryn G. Parrish,

APPELLANT,

versus

NHC Healthcare/Garden City, LLC,

RESPONDENT,

MOTION FOR COSTS

The Respondent, NHC Healthcare/Garden City, LLC, in the above-captioned appeal moves to be awarded costs against the Appellant, Cleo Bertiaux as Guardian for Kathryn G. Parrish, under Rule 222, SCACR. The Respondent's Motion is based on this Court's affirmance of the judgment on appeal by Opinion No. 2022-UP-283 filed July 6, 2022. The Remittitur was issued on July 29, 2022.

The Respondent incurred \$2,575.81 in taxable attorney's fees and costs in this matter. A sworn, itemized statement of these costs is attached. Accordingly, the Respondent respectfully requests that the Court award it \$2,575.81 in fees and costs pursuant to Rule 222, SCACR.

Respectfully submitted,

s/ Carmen V. Ganjehsani

Carmen V. Ganjehsani (S.C. Bar No. 73515)
RICHARDSON, PLOWDEN & ROBINSON, PA
1900 Barnwell Street (29201)
Post Office Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
cganjehsani@richardsonplowden.com

Marian Williams Scalise (S.C. Bar No. 6744)
Lydia L. Magee (S.C. Bar No. 16584)
RICHARDSON, PLOWDEN & ROBINSON, PA
2103 Farlow Street
P.O. Box 3646
Myrtle Beach, South Carolina 29578
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mscalise@richardsonplowden.com
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ATTORNEYS FOR RESPONDENT
NHC HEALTHCARE/GARDEN CITY, LLC

August 15, 2022.

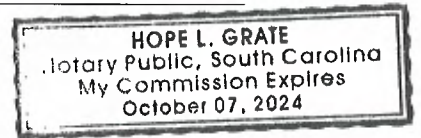
TOTAL	\$2,575.81	
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I, Carmen V. Ganjehsani, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement was served upon counsel for Appellant Cleo Bertiaux as Guardian for Kathryn G. Parrish via e-mail using the primary e-mail address listed for such counsel in the Attorney Information System pursuant to Section (d)(1) of the Supreme Court's Order dated May 6, 2022.

Carmen V. Ganjehsani
S.C. Bar No. 73515
RICHARDSON, PLOWDEN & ROBINSON, PA
Post Office Drawer 7788
Columbia, South Carolina 29202
ATTORNEYS FOR RESPONDENT
NHC HEALTHCARE/GARDEN CITY, LLC

Subscribed and sworn to before me this 15th day of August, 2022.

Notary Public for South Carolina
My Commission Expires: _____



(Seal)

APPROVED: _____

Clerk

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SC Court of Appeals

CERTIFICATE OF SERVICE

I, the undersigned, attorney for the Respondent, NHC Healthcare/Garden City, LLC, do hereby certify that I have this date served the foregoing Motion for Costs, dated August 15, 2022, by personally serving the same pursuant to Section (d)(1) of the Supreme Court's Order dated May 6, 2022, on the following counsel of record using the primary email addresses listed in the Attorney Information System (if applicable):

Robert D. Dodson
Law Offices of Robert Dodson, P.A.
1722 Main Street, Suite 200
Columbia, SC 29201
rdodson@rdodsonlaw.com
Attorney for Appellant

A copy of the sent email is enclosed with this Certificate of Service.

s/ Carmen V. Ganjehsani
Carmen V. Ganjehsani
S.C. Bar No. 73515
RICHARDSON, PLOWDEN & ROBINSON, PA
Post Office Drawer 7788
Columbia, South Carolina 29202
**ATTORNEYS FOR RESPONDENT
NHC HEALTHCARE/GARDEN CITY,
LLC**


Date: August 15, 2022.

Carmen Ganjehsani

From: Carmen Ganjehsani
Sent: Monday, August 15, 2022 12:22 PM
To: rdodson@rdodsonlaw.com
Cc: Marian Scalise; Lydia Magee
Subject: Cleo Bertiaux v. NHC Healthcare/Garden City, LLC (2019-001185)
Attachments: 2019-001185 Parrish v. NHC Healthcare - Garden City Mtn for Costs.pdf

Pursuant to the Supreme Court's Order dated May 6, 2022, please find served upon you the Motion for Costs on behalf of Respondent NHC Healthcare/Garden City, LLC.

Thank you,
Carmen Ganjehsani

HOME	VCARD	LOCATION
		<p>Carmen V. Ganjehsani Shareholder Cganjehsani@RichardsonPlowden.com</p> <p>Richardson Plowden & Robinson, P.A. 1900 Barnwell Street Columbia, SC 29201 Tel: 803.253.8692 Fax: 803.779.0016 www.RichardsonPlowden.com</p>

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Direct Dial: (803) 253-8692

August 15, 2022

Via hand delivery and e-mail (ctappfilings@sccourts.org)

The Honorable Jenny Abbott Kitchings
Clerk of Court, S.C. Court of Appeals
P.O. Box 11629
Columbia, SC 29211

RECEIVED
Aug 15 2022
SC Court of Appeals

Re: *Cleo Bertiaux as Guardian for Kathryn G. Parrish v. NHC Healthcare/Garden City, LLC*
Appellate Case No.: 2019-0001185
RPR File No.: 5622-61

Dear Ms. Kitchings:

Enclosed for filing is the Motion for Costs on behalf of Respondent NHC Healthcare/Garden City, LLC in the above-referenced case, along with our Certificate of Service. We are also filing this Motion electronically with the Court of Appeals via e-mail at ctappfilings@sccourts.org pursuant to Section (b)(2) of the Supreme Court's May 6, 2022 Order.

Also enclosed is our firm's check in the amount of \$50.00 for the filing fee in this matter.

We have served this Motion for Costs on counsel for Appellant upon his primary email address listed in the Attorney Information System.

Should you have any questions regarding this matter, please do not hesitate to call.

Sincerely,

/s Carmen V. Ganjehsani

Carmen V. Ganjehsani

cc: Robert D. Dodson (rdodson@rdodsonlaw.com)
Marian Williams Scalise (FYI)
Lydia L. Magee (FYI)