

THE STATE OF SOUTH CAROLINA
In The Court of Appeals

68505

APPEAL FROM BERKELEY COUNTY
Court of Common Pleas

The Honorable Roger Mack Young

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MAY 24 2013
SC Court of Appeals

Trial Court Case No. 2011-CP-08-1754

Angela Drexler, Appellant,

v.

CitiMortgage, Inc., Stonegate Properties, Inc., and
Branch Banking and Trust Company, Inc. Defendants.

Of Whom CitiMortgage, Inc. is the Respondent.

Appellate Case No. 2012-211306

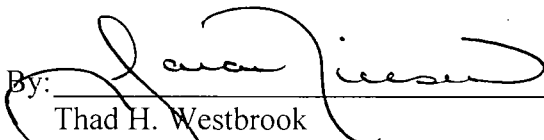
MOTION FOR FEES AND COSTS

Respondent CitiMortgage, Inc. ("Respondent") hereby files this Motion for Fees and Costs pursuant to Rule 222 of the South Carolina Appellate Court Rules. Respondent moves this Court for an order taxing all recoverable costs and fees against Appellant Angela Drexler ("Appellant") as allowed by Rule 222(b), SCACR, in the above-captioned appeal.

This Court affirmed the judgment of the circuit court in Unpublished Opinion No. 2013-UP-164, filed April 24, 2013. Accordingly, Respondent moves to have costs taxed against Appellant herein. See Rule 222(a), SCACR ("Unless otherwise ordered by the appellate court . . . costs shall be taxed against the appellant when the appeal is dismissed or judgment on appeal is affirmed."). This Court remitted this matter to the circuit court on May 14, 2013 and, therefore, this Motion comes within the time period proscribed in Rule 222(d), SCACR. A sworn, itemized

statement of fees and costs incurred by Respondent is attached to this Motion as required by Rule 222(d), SCACR.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: 

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Attorneys for Respondent CitiMortgage, Inc.

Columbia, South Carolina

5/04, 2013

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Appellant Case No. 2012-211306

ITEMIZED STATEMENT OF COSTS

The Appellate Court is requested to tax the following costs against the Appellant:

COSTS AND FEES TAXABLE UNDER RULE 222(b), SCACR	NO. OF PAGES	RATE	REQUESTED	ALLOWED (For Court Use Only)
Cost of Printing or Copying Final Brief	74	.05	\$3.70	
Attorney's Fee Provided by Rule 222(b), SCACR	\$1,000.00		\$1,000.00	
Other (specify and explain)				
TOTAL			\$1,003.70	

I, Sarah B. Nielsen, Esquire, do swear or affirm that the foregoing costs are correct and were necessarily incurred in this action. A copy of this statement is mailed to opposing counsel.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By:


Sarah B. Nielsen

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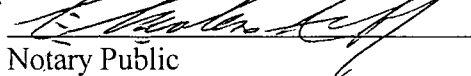
Columbia, SC 29201

(803) 799-2000

Attorneys for Respondent CitiMortgage, Inc.

SWORN to and subscribed before me

this 23rd day of May, 2013



(L.S.)

Notary Public

My Commission Expires: 4/8/2019

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PROOF OF SERVICE

I, the undersigned Administrative Assistant of the law offices of Nelson Mullins Riley and Scarborough, LLP, attorneys for Respondent, CitiMortgage, Inc., do hereby certify that I have served all counsel in this action with a copy of the pleadings(s) hereinbelow specified by mailing a copy of same by United States Mail, postage prepaid, to the following address(es):

Pleadings: MOTION FOR FEES AND COSTS

David P. Traywick, Esquire
TRAYWICK LAW OFFICES, LLC
P.O. Box 564
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Jes Sterling, Esquire
Smith, Jordan, Lavery & Lee, P.A.
14 Halter Drive
Piedmont, SC 29673

A handwritten signature in cursive script, appearing to read "Charlene Ruff", written over a horizontal line.

Charlene Ruff
Administrative Assistant

May 24, 2013

Nelson Mullins

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May 24, 2013

Hand Delivered

Honorable Jenny Abbott Kitchings
South Carolina Court of Appeals
1015 Sumter Street
Columbia, SC 29201

RE: Angela Drexler v. CitiMortgage, Inc., et al.
Civil Action No. 2011-CP-08-1754
Our File No. 26019.01639

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SC Court of Appeals

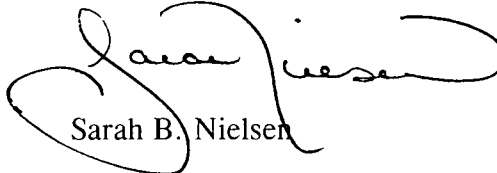
Dear Ms Kitchings:

Enclosed please find an original and one copy of defendant, CitiMortgage, Inc.'s Motion for Fees and Costs in the above-referenced matter. Also enclosed is our Firm's \$25.00 filing fee check. We would appreciate your filing the original and returning a filed copy to us via our courier.

By copy of this letter to counsel of record, we are providing them with a copy of the same.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact us.

Very truly yours,



Sarah B. Nielsen

SBN:cruff
Enclosure

cc: David P. Traywick, Esquire
Benjamin E. Grimsley, Esquire
Jes Sterling, Esquire